

County of Ventura  
Board of Supervisors Hearing  
September 15, 2020  
Case No. PL17-0141

**Exhibit 19.g**

**Final EIR, Chapter 2, Individual Comments and Responses to  
Comments 1 through 100**

## 2.6 INDIVIDUALS

**From:** Adam Vega <adam@pestidereform.org>  
**Sent:** Thursday, February 27, 2020 4:58 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** General Plan Comments

Letter  
I1

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Susan,

I feel there is a great opportunity to improve the Food Security (8.4) section of our General Plan. I've included a link to the Santa Barbara Food Action Plan for your review. From this plan I've gleaned language which I feel is vital for your consideration!

<https://www.sbcfoodaction.org/wp-content/uploads/2016/09/SBC-Food-Action-Plan-2016FinalReport-update.pdf>

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### INVEST IN OUR FOOD ECONOMY

**Invest in Our Food Economy** calls us to support a new, diverse generation of food and farming entrepreneurs with training, education, preferential purchasing policies, and investments in food distribution infrastructure. These upstream investments are designed to pay increasing dividends over time as these entrepreneurs build local businesses and create jobs.

- Support the next generation of farmers and food system entrepreneurs by creating or expanding agriculture and vocational education at the high school and community college level.

I1-1

### INVEST IN OUR HEALTH & WELLNESS

#### **Invest in Our Health & Wellness**

Calls us to address the continuing diet-related challenges in our community by creating networks of neighbor-to-neighbor support, and by engaging employers, teachers, and physicians as partners to promote healthy living. The strategies focus on the information gaps that make it hard to make good health choices.

- Facilitate the adoption and implementation of workplace wellness policies that include support for healthy eating behaviors and access to healthy foods.

Thank you,

Adam

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**Adam Vega**  
 Pesticide Community Organizer  
 Californians for Pesticide Reform  
[4225 Saviers Rd., Oxnard, CA 93033](https://www.pestidereform.org)  
 Phone: (805) 312-6875  
[www.pestidereform.org](https://www.pestidereform.org)  
*Working together for a just & sustainable food system since 1996*<sup>1</sup>



<b>Letter I1</b>	<b>Adam Vega</b> February 27, 2020
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- I1-1      The comment suggests additional topics that could be considered in the 2040 General Plan—namely that the Santa Barbara Food Action Plan should be considered in Section 8.4, “Food Security”—and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**From:** Alda Perry <aldaperry@gmail.com>  
**Sent:** Wednesday, February 26, 2020 12:35 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan Draft EIR Comment

Letter  
12

To: Ms Susan Curtis

Ventura County's proposed 2040 General Plan is based on a flawed and deficient analysis of the impacts this proposal will have on agriculture, water supplies, and wildfire risk. State law, under the California Environmental Quality Act (CEQA), requires an "environmental impact report" (EIR) be prepared to evaluate and analyze the impact of the proposed changes. The County has not complied with CEQA because of its reliance on an inadequate and hurriedly compiled EIR.

I2-1

A few of the "big issues:"

- 1) CEQA requires that any mitigation measures proposed in the EIR be technically and economically feasible. But many of the County's proposed mitigation measures are infeasible.
- 2) CEQA requires that the EIR use accurate and detailed data in the analysis. But the EIR and its 1000+page Background Report are filled with errors, vague statements and outdated information.
- 3) CEQA demands that any policies that increase wildfire risk be analyzed. Yet the EIR doesn't even mention policies from the General Plan that will significantly increase fuel load in high fire risk areas.
- 4) CEQA requires that both direct and indirect impacts be analyzed. Yet the County simply fails to analyze the impact of competition for water supplies on agriculture, even though the EIR admits that the increased development resulting from the General Plan will result in less water for irrigation.

I2-2

I2-3

I2-4

A significant **indirect** impact required to be addressed by CEQA has not been analyzed in the development of the new General Plan. The County failed to analyze or propose mitigation for any indirect significant impacts on agriculture from the buildout that will occur from the 2040 General Plan.

As a resident of Ventura County and a committed Ventura County farmer<sup>[1]</sup> for over 40 years, and a member of a Ventura County farming family for over 150 years, I have seen that complaints from encroaching urban uses will mandate changes in normal farming practices. This most recent example of this is the new hemp cultivation set back.

I2-5

As population grows, there will be more and more complaints of dust, odors, water use, types of crops grown. There will be more theft and vandalism<sup>[2]</sup> - which increases costs to the farmer and cause the County to pass new rules that put more restrictions on agriculture.

The County did not discuss these indirect impacts in their analysis, and they did not propose any mitigation to reduce this impact. The County needs to fully evaluate how encroaching development will impact the long-term sustainability of agriculture in the County and propose mitigation that addresses impacts in a way that reduces restrictions on agriculture.

Based on the substantial flaws and deficiencies of the EIR relied on by the County in its design of the new General Plan, as a citizen and farmer, I demand that the County correct and re-circulate the EIR.

I2-6

Thank you for your attention to my concerns.

Alda L. Perry

<sup>[1]</sup> Our ranch has been contracted with the County for many years under the Williamson Act.

<sup>[2]</sup> Just last month our ranch suffered an avocado theft. See Crime Report Number 20-8138. In recent years we have had our well disabled **twice** in a thief's effort to steal the copper wiring that runs from the electrical box to the submersible pump approximately 700 feet in the ground. Before that we had several hundred feet of chain-link fencing ripped out by a vandal who stole a neighbor's tractor and ran it into the fence. Our ranch is in a very remote area, yet we still suffer from encroaching "civilization."

I2-5  
cont.

<b>Letter I2</b>	<b>Alda L Perry</b> February 26, 2020
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- I2-1 This comment regarding the adequacy of the analysis of impacts related to agricultural resources, water supply, and wildfire risk in the draft EIR is noted. The comment also states that proposed mitigation measures are infeasible; however, no specifics are provided. The California Environmental Quality Act (CEQA) requires that an EIR identify potentially feasible mitigation. The ultimate determination of mitigation feasibility will be made by the lead agency, in this case the County, at the time a decision is rendered about whether to approve the project. However, no specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided.
- I2-2 The commenter's statement about the accuracy and level of detail in the Background Report are noted. Refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I2-3 The comment states that the draft EIR does not mention policies that would increase fuel load in high fire risk areas; the comment does not identify any specific policies that are missing from the draft EIR analysis. The comment's statement is not correct. Section 4.9, "Hazards, Hazardous Materials and Wildfire," in the draft EIR lists proposed policies and implementation programs related to wildfire risks on pages 4.9-6 through 4.9-10, including Policies HAZ-1.8, COS-1.15, COS-3.2, and Implementation Program C. Also, see response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation to increase wildland fire hazard.
- I2-4 The comment states that the draft EIR does not analyze the impact of competition for water supplies on agriculture, and further states that the draft EIR does not include this analysis even though increased development under the 2040 General Plan would result in less water for irrigation.

Despite the framing in the comment, the draft EIR does not conclude that a reduction in available water resources for irrigation is a significant impact. This is provided as an example of an indirect impact in the draft EIR on page 4.2-3. A reduction in available water resources that causes the loss or conversion of farmland to non-agricultural use is not a potential impact of the project and is, therefore, appropriately excluded from the draft EIR impact discussion. First, it is important to note that the 2040 General Plan does not direct a certain amount of development; rather, it accommodates projected development. In terms of water demand, as explained in draft EIR Impact 4.17-4, Mitigation Measure UTL-1 would require that "water-demand projects," as defined by State law, that require service from a public water system prepare a water supply assessment before project approval. Mitigation Measure UTL-1 demonstrates that new development accommodated by the 2040 General Plan would not take water supplies away

from existing users such as existing agricultural users. As a result, it is not expected that development facilitated by the 2040 General Plan would result in competition for water resources that would cause fallowing of farmland, conversion or loss of agricultural resources, or other impacts to agricultural resources. The draft EIR, therefore, properly excludes indirect impacts to agriculture from a reduction in available water resources.

I2-5

The comment states that the draft EIR does not analyze indirect impacts on agriculture resulting from buildout of the 2040 General Plan. The comment asserts that encroaching urban uses will result in changes in farming practices and that population growth will result increased in complaints about dust, odors, water use, types of crops grown, and result in more theft and vandalism.

The draft EIR analyzes the potential for development under the 2040 General Plan to result in conflicts with classified farmland in Impact 4.2-2 (starting at page 4.2-17) and conflicts with Land Conservation Act (LCA) contracts and Agricultural Preserves in Impact 4.2-3 (starting at page 4.2-18). The draft EIR explains that the County maintains a number of policies and programs to protect agriculture land uses and prevent conflict between agricultural and non-agricultural land uses. The 2040 General Plan also includes policies and programs to protect agricultural land uses from encroachment of adjacent non-agricultural land uses. Refer to draft EIR Impacts 4.2-2 and 4.2-3 for a discussion of nuisance issues that can arise from conflicts between agricultural and non-agricultural land uses; discussions of nuisance complaints can be found on pages 4.2-17 and 4.2-19 of the draft EIR. Policy AG-2.3 of the 2040 General Plan, listed on page 4.2-10 of the draft EIR, refers to the County's Right-to-Farm Ordinance, which shall be maintained and updated as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas. The County's Agricultural/Urban Buffer Policy, discussed on pages 4.2-18 and 4.2-20 of the draft EIR, protects the economic viability and long-term sustainability of agriculture in the unincorporated area. This policy conditions urban developments or non-agricultural uses to provide and maintain a 300-foot setback and chain-link fence on the non-agricultural property use, or a 150-foot buffer/setback if a vegetative screen is used. This policy would substantially lessen the potential conflict LCA contracts or agricultural preserves (AGP) by requiring buffers or screening between specified agricultural and non-agricultural land uses to prevent or minimize conflicts that may arise at the interface of agricultural lands and urban structures or ongoing non-farming activities.

Impact 4.2-2 concludes that:

Future development under the 2040 General Plan would not be expected to result in adverse impacts to agricultural uses by locating non-agricultural development near classified farmland due to policies and programs that limit conflicts to agricultural uses, establish buffers between crop production, orchard production, classified farmland and nonagricultural uses, to minimize agricultural land conversion. Future growth and development are expected to occur near or within existing

community boundaries and cities, pursuant to the Guidelines for Orderly development. Therefore, the potential for conflicts would be minimal. This impact would be less than significant (page 4.2-18).

Impact 4.2-3 concludes that:

No direct land use conflicts with existing LCA contracts would occur as a result of the land use diagram of the 2040 General Plan because it would not change the land use designation of any land under an existing LCA contract. No environmental impacts associated with residential development adjacent to any land under LCA/Williamson Act Contracts and AGP are expected to occur due to the protections and guidelines established in policies and programs that limit conflicts with agricultural uses and establishment of buffers between most agricultural and nonagricultural uses. Future growth and development are expected to occur near or within Existing Community area designation (boundary) and Urban area designation (boundary), pursuant to the Guidelines for Orderly development. This impact would be less than significant (page 4.2-20).

Regarding theft and vandalism, these impacts would not be significant because EIRs are not required to speculate about a project's environmental impacts (State CEQA Guidelines, § 15145). The commenter does not present evidence that theft and vandalism would occur to such an extent as a result of the 2040 General Plan that agricultural uses or operations would cease to exist, although the County acknowledges that such activities occur in the existing condition and may occur to some degree in the future (e.g., stolen equipment, illegal picking, litter tossed into fields). Moreover, the plan area includes law enforcement services (e.g., to address theft, vandalism). As a result, a discussion of the impacts of theft and vandalism on agriculture is appropriately excluded from Impact 4.2-2.

CEQA requires that an EIR “describe feasible measures which could minimize significant adverse impacts” (State CEQA Guidelines, § 15126.4(a)(1)). As described for Impact 4.2-2, indirect and direct conflicts between agriculture and adjacent non-agricultural uses as result of 2040 General Plan implementation would be less than significant. As described for Impact 4.2-3, conflicts between residential development and any land under LCA contract or AGP would also be less than significant. As a result, no mitigation is required.

Also refer to response to comment A13-3 regarding Urgency Ordinance 4558.

I2-6

Note that the draft EIR analyzes the potential environmental effects of implementing the 2040 General Plan; it was not used to design the plan under evaluation. Regarding the comment that the draft EIR should be recirculated, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required, and the responses above that demonstrate the adequacy of the draft EIR with respect to the issues raised by the commenter.

**From:** Ally Gialketsis <info@email.actionnetwork.org>  
**Sent:** Saturday, February 22, 2020 7:04 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Climate change has environmental impacts!

Letter  
I3

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to [Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

I3-1

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I3-2

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I3-3

I want an EIR that covers major climate impacts via a systematic plan.

Thank you—

Ally Gialketsis  
[agialketsis@gmail.com](mailto:agialketsis@gmail.com)  
 380 Teloma Drive  
 Ventura, California 93003

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I want an EIR that covers major climate impacts via a systematic plan.

Thank you—

Ally Gialketsis  
[agialketsis@gmail.com](mailto:agialketsis@gmail.com)  
 380 Teloma Drive  
 Ventura, California 93003

<b>Letter I3</b>	<b>Ally Gialketsis</b> February 22, 2020
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**I3-1** The comment expresses concern about climate change. The comment summarizes the anticipated consequences of anthropogenic climate change. The comment expresses a desire for “strong climate policy” in the 2040 General Plan and a goal of carbon neutrality by 2045. It is not related to the adequacy of the draft EIR. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

The County has completed a California Environmental Quality Act-compliant analysis of the environmental impacts that can be reasonably anticipated to result from implementation of the 2040 General Plan. For a full discussion of the potential for development in the county to result in greenhouse gas (GHG) emissions that could contribute to climate change, refer to Section 4.8, “Greenhouse Gas Emissions,” in the draft EIR.

**I3-2** The comment asserts that GHG emissions must be inventoried using the most current climate change science. GHG emissions for the unincorporated county in 2015 are summarized in Table 4.8-1 on page 4.8-5 of the draft EIR. Page 4.8-4 includes a discussion explaining the methodology used to determine these levels of emissions. To reiterate what is explained in the draft EIR, the 2015 community-wide GHG inventory was prepared using the U.S. Community Protocol for Accounting and Reporting of GHG Emissions, Version 1.1 with the most recent global warming potential (GWP) values derived from the Intergovernmental Panel on Climate Change’s Fifth Assessment Report, which is the most recently published assessment report. These global warming potential values represent the current climate change science and are appropriate for use in this analysis. The comment does specifically address the adequacy of the draft EIR. Therefore, no further response can be provided.

I3-3

The comment introduces potential mitigation that could be applied to sources of GHG emissions within the plan area such as a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes. Similar policies and programs were considered by the County and integrated into the 2040 General Plan. The 2040 General Plan provides a systematic approach to reasonably attainable GHG emission reductions.

The draft EIR evaluates the environmental effects of the 2040 General Plan, which contains policies to reduce GHG emissions throughout the unincorporated county. The language of the 2040 General Plan is considered a component of the project description as defined by California Environmental Quality Act Guidelines, Section 15124. The draft EIR evaluates the efficacy of the 2040 General Plan policies under the assumption that these policies would be implemented as written and derives a significance conclusion based on these reductions.

The relevant 2040 General Plan policies and implementation programs that would reduce GHG emissions within the plan area are summarized on pages 4.8-11 through 4.8-37 of the draft EIR and, where feasible, these measures are quantified by GHG-emitting sector as shown in Table 4.8-6 of the draft EIR. See Master Response MR-1 for additional discussion of the draft EIR GHG emissions impact analysis and potential mitigation measures to address GHG emissions. Refer to Master Response MR-4, Section MR-J, “Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations), for response to the commenter’s request for a “sunset plan” for oil and gas production.



**VIA ELECTRONIC MAIL:** [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

**Letter  
I4**

February 25, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I4-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I4-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I4-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The

I4-4

costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I4-4  
cont.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I4-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I4-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I4-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I4-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I4-9

Sincerely, Andy Ehrhart

**Letter  
I4**

**Andy Ehrhart**  
February 25, 2020

- I4-1 This comment regarding the adequacy of the draft EIR is noted. However, no specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided.
- I4-2 The comment expresses concern about the feasibility of Mitigation Measure AG-2, including cost of implementation and potential to prohibit construction of structures that would support agricultural operation. Refer to Master Response MR-5 for a detailed discussion of this mitigation measure.

I4-3           The comment states that the draft EIR does not provide an analysis on increased water cost and diminishing availability of water. As explained in the “Methodology” subsection of Section 4.2, “Agriculture and Forestry Resources,” a reduction in available water resources for irrigation is considered an indirect impact on agricultural resources; this is provided as an example of an indirect impact in the draft EIR on page 4.2-3. A reduction in available water resources that causes conversion of Farmland is not a potential impact of the project and is, therefore, appropriately excluded from the draft EIR impact discussion. As explained in the discussion of Impact 4.17-4 in Section 4.17, “Utilities,” of the draft EIR, Mitigation Measure UTL-1 would require that water-demand projects that require service from a public water system shall prepare a water supply assessment prior to water approval. Mitigation Measure UTL-1 demonstrates that new development accommodated by the 2040 General Plan would not take water supplies away from existing users such as existing agricultural users. As a result, it is not expected that development facilitated by the 2040 General Plan would result in competition for water resources that would cause following of farmland, conversion or loss of agricultural resources, or other impacts to agricultural resources. Impacts to the cost of water due to development caused by implementation of the 2040 General Plan do not need to be addressed in the EIR unless there is a clear association with an adverse effect on the physical environment. The draft EIR therefore properly excludes impacts to agriculture from a reduction in available water resources. Refer to responses to comments A13-11 and O7-4 for further discussion of available water supplies and cost.

I4-4           The comment raises concerns with the economic feasibility of policies proposed in the 2040 General Plan that could affect agricultural operations. Although referenced in the comment as mitigation measures, the subject requirements are proposed in the 2040 General Plan. The draft EIR evaluates the potential physical effects on the environment that could result from implementation of the 2040 General Plan. As discussed further below, social and economic effects need only be considered in an EIR where there is a clear link between those economic or social effects and physical environmental changes. The financial concerns raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR.

For clarity, Policy AG-5.2 and Policy AG-5.3, encourage a transition to electric- or renewable-powered agricultural equipment and electric- or renewable- powered irrigation pumps, respectively, and do not require conversion of all farm equipment to electric power. Moreover, to address the potential financial implications of these policies, the Agricultural Element of the 2040 General Plan includes Implementation Program J, through which the County would work to identify funding sources or financial incentives that would help offset the cost of the conversion. The economic impacts of these policies were not evaluated in the draft EIR because the California Environmental Quality Act (CEQA) does not require an evaluation of economic impacts of a project unless they result in a physical change in the environment (State CEQA Guidelines, § 15131(a)).

Furthermore, Policy AG-5.2 and Policy AG-5.3 would be implemented via Implementation Program I, Fossil Fuel-powered Equipment Replacement, in the

Agricultural Element. This implementation program requires that “[t]he County coordinate with [Ventura County Air Pollution Control District (VCAPCD)] and electric utilities to develop a program to establish a countywide fossil-fuel powered equipment conversion target, track progress on conversions to renewable energy sourced electric powered systems and provide technical assistance to users considering replacement of pumps.” The requirements of this implementation program are undefined to the point that reasonably foreseeable impacts cannot be determined at this time. The implementation program only requires coordination to establish a target, track progress, and provide technical assistance. The 2040 General Plan contains no requirement for mandatory provisions to be included in the program. Additionally, the County does not have jurisdiction over many types of agricultural equipment, and VCAPCD’s jurisdiction is limited (e.g., it has no authority to regulate mobile emission sources). Therefore, it is not possible to predict a mix of actions—either mandatory and voluntary—and the economic effects of such a program. Moreover, to address the potential financial implications of these policies and programs, the Agriculture Element of the 2040 General Plan includes Implementation Program J, through which the County would work to identify funding sources or financial incentives that would help offset the cost of the conversion. As a result, any economic impacts cannot be characterized and any physical impacts resulting from economic impacts cannot be defined. These impacts are not reasonably foreseeable. Any evaluation of these impacts would be considered speculative under CEQA because of the number of ways such a program could take shape after consultation with the VCAPCD and utilities, and because it is unknown whether any actions would even be mandatory. Therefore, the draft EIR correctly excludes consideration of impacts of Policy AG-5.2 and Policy AG-5.3 from the agricultural impact discussion.

Policies AG-3.2 and AG-3.3 do not limit the use of specific pesticides, fumigants, and fertilizers, but rather encourage and support the use of integrated pest management practices and provide information for how to do so. Similarly, Policy AG-5.1 encourages the use of inorganic, nitrogen-based fertilizers to reduce nitrogen emissions, but does not explicitly require it. The comment does not provide additional information to support the assertion that economic feasibility of these policies will make agriculture “virtually impossible” and cause existing agricultural uses or operations to cease to exist. As discussed above, a lead agency need not speculate about environmental impacts (State CEQA Guidelines, § 15145) and therefore a discussion of the economic impacts of Policies AG-3.2, AG-3.3, and AG-5.1 is excluded from the draft EIR.

I4-5

The comment expresses concern about the quality and age of the data used in the existing setting to establish the baseline for the CEQA analysis. Refer to Master Response MR-6 for a discussion of the accuracy, timeliness, and level of detail in the Background Report. The comment refers to unspecified detailed studies that must be added to identify impacts and mitigation measures for “the agricultural industry” but it is not clear from the comment what the scope of such studies should be or their relation to the draft EIR analysis of agricultural resources impacts in Section 4.2, “Agriculture and Forestry Resources.” As a result, no further response can be provided.

- I4-6            The comment states that the draft EIR offers limited mitigation related to fire prevention. The draft EIR included a program-level, qualitative assessment of impacts related to wildfires in the Section 4.9, “Hazards, Hazardous Materials, and Wildfire.” There are no mitigation measures proposed in the analysis that would limit agricultural operations to promote fire prevention. There is also no mitigation proposed in Section 4.4, “Biological Resources,” that would limit vegetation management necessary to manage fire risk. Note that the County’s Habitat Connectivity and Wildlife Corridor ordinances, which were adopted in March of 2019 to provide protections for areas designated as important wildlife corridors within the non-coastal unincorporated area, are separate from the 2040 General Plan currently under review.
- Impact 4.9-6 on page 4.9-19 of the draft EIR recognizes exposure of people to risk by wildfire due to the location of development in a High Fire Hazard Area/Fire Hazard Severity Zone as a significant and unavoidable impact. However, federal, State, and local plans and regulations would reduce the risk of wildfire in the plan area by requiring vegetation management and compliance with applicable building codes that require access to adequate fire suppression infrastructure and specify the materials and construction methods for protection against exterior wildfire exposure. Specifically, the 2015 Ventura County Multi-Hazard Mitigation Plan and the Ventura County Community Wildfire Protection Plan contain additional policies, regulations and procedure for handling wildfires and identifies mitigation strategies to minimize impacts related to wildfires. In addition, the 2040 General Plan includes a suite of policies and implementation programs that address a full spectrum of wildfire prevention standards for new development including vegetation management, fire suppression equipment, discouraging development in fire hazard areas, and education programs to prevent wildfires. It should be noted that wildlife corridors are subject to all existing fire prevention regulations of the Ventura County Fire Protection District. See response to comment O32-30 for additional discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation to increase wildland fire hazard.
- I4-7            Refer to response to comment O7-8 regarding potential incompatibilities of agricultural uses with adjacent bicycle and pedestrian paths. The potential for development under the 2040 General Plan to directly cause conversion of farmland to non-agricultural use is addressed in Impact 4.2-1. The draft EIR concludes that impacts would be significant and unavoidable, even after implementation of Mitigation Measures AG-1 and AG-2. This conclusion covers all development undertaken pursuant to the 2040 General Plan, and therefore includes development of bicycle paths.
- I4-8            The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I4-9            The commenter’s request for additional study of the issues raised in this letter, revision of the draft EIR, and subsequent recirculation is noted. However, no specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

Ann C. Cooluris  
 c/o Hoffman, Vance & Worthington  
 1000 S. Seaward Avenue  
 Ventura, CA 93001

Letter  
 15

FEB 27 2020 9:50

February 24, 2020

Ventura County Board of Supervisors  
 Attn: RMA Planning Division  
 General Plan Update  
 800 Victoria Avenue L#1740  
 Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I5-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I5-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I5-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I5-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I5-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I5-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I5-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I5-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I5-9

Sincerely,

Ann C. Cooluris



<b>Letter I5</b>	<b>Ann C Cooluris</b> February 24, 2020
----------------------	--

This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I5-1            Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I5-2            Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I5-3            Refer to response to comment I4-3 regarding water availability and cost.
- I5-4            Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I5-5            Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I5-6            Refer to response to comment I4-6 regarding wildfires, fire prevention, and the County's Habitat Connectivity and Wildlife Corridor ordinances.
- I5-7            Refer to response to comment I4-7 regarding potential incompatibilities of agricultural uses with adjacent bicycle and pedestrian paths.
- I5-8            The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I5-9            Refer to response to comment I4-9 and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.



**From:** Anna Chambers <achambers316@gmail.com>  
**Sent:** Thursday, February 27, 2020 1:01 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** General Plan / EIR Comments

**Letter  
I6**

To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

I6-1

I support this letter -

Anna M. Chambers

**Letter  
I6**

**Anna Chambers**  
February 27, 2020

I6-1

The comment asserts that the draft EIR does not evaluate the feasibility of Mitigation Measure AQ-3. As discussed in response to comment O6-12, the California Air Resources Board's 2017 Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways, suggests that people living as much as 1,000 feet from freeways have been adversely affected by poor air quality at night and in the early morning because near-roadway pollution exposure had been previously underestimated. Recognizing this health risk, the draft EIR includes Mitigation Measure AQ-3, which would require that land uses that include sensitive receptors to be setback from specified heavily traveled transportation corridors or undergo a health risk assessment. As explained in the response to comment O6-12, the County has revised Mitigation Measure AQ-3 to reflect the 1,000 foot-setback distance. The mitigation measure does not prevent development from occurring within the setback distance; it requires that a site-specific health risk assessment first be prepared.

Section 4.11, "Land Use and Planning," does not include the text quoted in the comment as a description of the project under analysis. The impact analysis (page 4.11-18) does describe that "[t]he land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101."

**From:** Anna Chambers <achambers316@gmail.com>  
**Sent:** Thursday, February 27, 2020 1:03 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan EIR

Letter  
I7

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I support the attached letter.

I I7-1

Anna M. Chambers



Ventura County CoLAB  
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Tony Skinner, IBEW Local 952  
*Director*

Alex Teague, Limoneira  
*Director*

Andy Waters, Waters Family Farms  
*Director*

February 19, 2020

Sanger Hedrick, Chair  
Agricultural Policy Advisory Committee (APAC)  
County of Ventura  
800 S. Victoria Blvd.  
Ventura, CA 93003

**Re: 2040 General Plan Environmental Impact Report (EIR)**

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, **taking into account economic, environmental, social, and technological factors**" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

- 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
- 2) The cost per acre to purchase each category of farmland;
- 3) The anticipated cost of establishing a conservation easement for each category of farmland;
- 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
- 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
- 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

I7-2

I7-3

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 2 of 4

- 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
- 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
- 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

I7-3  
cont.

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

#### Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

I7-4

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...**Therefore, the potential for conflicts would be minimal. This impact would be less than significant**" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural



Page 3 of 4

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

I 17-4  
cont.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

I 17-5

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

#### Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

I 17-6

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

#### Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

I 17-7

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion. But the County fails to analyze or propose mitigation measures to address this significant impact.

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

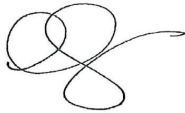
CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

- 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
- 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
- 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

I7-8

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,



Louise Lampara  
Executive Director

I support this letter -  
Anna M. Chambers

<b>Letter I7</b>	<b>Anna Chambers</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter A13. The responses below provide cross references to the portions of Letter A13 where responses to the same comments have already been provided.

- I7-1      The comment references an attachment to the main body of the letter, which is a letter submitted by the Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) and included in this final EIR as Letter A13. The County has reviewed the attachment and determined that it raises significant environmental issues for which a response is required. The County's responses to these issues are provided in response to Letter A13, and these responses are cross-referenced below.
- I7-2      The comment describes that CoLAB has provided the following comments to the Agricultural Policy Advisory Committee describing issues with the draft EIR "that CoLAB believes will negatively impact the viability of local agriculture." This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I7-3      Refer to response to comment A13-7 and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I7-4      Refer to response to comment A13-8 regarding the Right-to-Farm Ordinance and land use conflicts.
- I7-5      Refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I7-6      Refer to response to comment A13-10 regarding General Plan Policies AG-5.2 and AG-5.3.
- I7-7      Refer to response to comment A13-11 regarding water resources and loss of topsoil.
- I7-8      Refer to response to comment A13-12 regarding mitigation measure suggestions.

**From:** Anna Chambers <achambers316@gmail.com>  
**Sent:** Thursday, February 27, 2020 1:03 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comments on VC Gen Plan DEIR

Letter  
18

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I support the attached letter.

I 18-1

Anna M Chambers

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 South Victoria Avenue, L#1740  
 Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across

18-2

18-3

18-4

18-5



sectors – all of which influence the ability to live and work in this region. The DEIR’s lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

18-5  
cont.

I appreciate your consideration.

*I support this letter -  
Anna M Chambers*

<b>Letter 18</b>	<b>Anna Chambers</b> February 27, 2020
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- 18-1 The comment references an attachment to the main body of the letter. The County has reviewed the attachment and determined that it raises significant environmental issues for which a response is required. The County’s responses to these issues are provided below.
- 18-2 The comment provides a description of the McLoughlin Family Committee and history of the McLoughlin Family and an opinion of the adequacy of the 2040 General Plan and draft EIR with respect to analysis of impacts on the farming industry. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- 18-3 Table 6-26 in the Background Report summarizes the capital improvement projects for fiscal years 2018 through 2021 identified in the Ventura County Transportation Department’s Capital Improvements Program (CIP). As explained on page 6-87 of the Background Report, the CIP “is an internal programming document that identifies all capital improvement projects (e.g., roads and bridges) the County intends to build, replace or improve over a 20-year horizon...The CIP provides a means for the County to determine the capital improvement projects and funding priorities over a 20-year horizon.” One of the CIP projects listed in Table 6-26 is a feasibility study for widening of Olivas Park Drive from Telephone Road to Seaborg Drive to improve traffic safety. This feasibility study is a project ranked #9 in the Strategic Master Plan, a Ventura County Public Works document that identifies needs and transportation improvements recommended for programming. These are existing infrastructure planning processes that are separate from the 2040 General Plan; therefore, an analysis of the potential effects of these projects is not appropriate in the draft EIR.

The 2040 General Plan does not include any policies specific to Olivas Park Drive or the property owned by McLoughlin Family Committee. Policy PFS-1.6 would prioritize capital improvements that repair and replace inadequate facilities, while Policy AG-2.2 would specifically require that transportation and other capital improvements are planned to “avoid or mitigate impacts to important farmland to the extent feasible.”

- I8-4      The comment raises concerns about the potential for inconsistencies of the 2040 General Plan with the Save Open Space and Agricultural Resources (SOAR) initiative that could result in physical environmental impacts, citing Section 3.2.2, “Relationship to Other Plans and Regulations,” of the draft EIR, which explains that the County SOAR initiative’s Agricultural, Open Space, and Rural goals and policies “are included in the 2040 General Plan with only technical, non-substantive revisions for clarification and internal consistency with the rest of the 2040 General Plan” (draft EIR page 3-8).

The draft EIR does not highlight specific policy language differences between SOAR and the 2040 General Plan; however, the 2040 General Plan does include notes regarding the source of each policy. To ensure consistency with SOAR, all lands in the existing General Plan with a land use designation of Agricultural, Open Space, or Rural located outside of Existing Community and Urban designated areas are maintained unchanged in the 2040 General Plan (see draft EIR page 3-5). Subsequent projects must comply with the 2040 General Plan, as well as SOAR, which is part of the 2040 General Plan itself. Compliance with regulatory requirements is assumed in the draft EIR analysis.

Refer also to Master Response MR-2 regarding the 2040 General Plan’s consistency with SOAR.

- I8-5      The comment anticipates that implementation of the 2040 General Plan would result in broad economic impacts that have not been evaluated in the draft EIR and requests recirculation of the draft EIR.

EIRs are not required to treat a project’s economic or social effects as significant effects on the environment (State CEQA Guidelines, § 15131). Economic effects need only be considered in an EIR where there is a clear link between those effects and physical environmental changes. The comment does not provide evidence to link the general economic issues raised in this comment to any adverse physical changes to the environment not already addressed in the draft EIR. Therefore, no revisions to the draft EIR have been made in response to this comment.

Refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Anna Chambers <achambers316@gmail.com>  
**Sent:** Thursday, February 27, 2020 1:04 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** VC Gen Plan DEIR flaws

Letter  
19

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I support the attached letter.

I I9-1

Anna M. Chambers

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I9-2

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, "unlike the Preble area, services are not readily available to the Olivas lands." This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is "not included in the City's sanitation district because of problems with water pressure." This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district's pipelines actually traverse our property.

I9-3

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

I9-3  
cont.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I9-4

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

I9-5

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.

I9-6

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."

I9-7

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.

I9-8

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

I9-9

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

I9-10

Sincerely,

*I support this letter -  
Anna M Chambers*

<b>Letter I9</b>	<b>Anna Chambers</b> February 27, 2020
I9-1	The comment references an attachment to the main body of the letter. The County has reviewed the attachment and determined that it raises significant environmental issues for which a response is required. The County's responses to these issues are provided below.
I9-2	The history of the McLoughlin family and their land in Ventura County is noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
I9-3	The comment addresses statements in the Coastal Area Plan, which is a component of the General Plan, relative to property owned by the commenter and is not related to the adequacy of the draft EIR. Therefore, no response is required. Note also that no changes were made to the Coastal Area Plan as part of the preparation of the 2040 General Plan. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Refer to response to comment I8-3 for a discussion of widening of Olivas Park Drive, which is not a component of the 2040 General Plan.
I9-4	The comment expresses general concern about the portrayal of a specific property in the draft EIR with respect to access to infrastructure. This property is not specifically described in the draft EIR. The comment does not provide sufficient detail about where such misstatements occur to permit identification and correction. Therefore, no further response is provided.
I9-5	<p>The comment states that the 2040 General Plan and draft EIR ignore the 28 percent increase in the homeless population in the community. While the origin of this 28 percent figure is unclear, it appears that the commenter is concerned about an existing social condition that the commenter would like the 2040 General Plan to rectify. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.</p> <p>The comment is not related to the adequacy of the draft EIR because the homeless population is an existing condition and EIRs are not required to treat a project's social effects as significant effects on the environment (State CEQA Guidelines, § 15131). Social effects need only be considered in an EIR where there is a clear link between those social effects and physical environmental changes. The homelessness issues raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR.</p>
I9-6	Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.

- I9-7      The comment states that the draft EIR does not adequately address the indirect impacts of implementing the 2040 General Plan and labels such impacts as, “less than significant.” It’s not clear if the commenter is referring to the entire draft EIR or to specific analysis. As explained in the “Approach to Environmental Analysis” (page 4-3 of the draft EIR):
- Adverse physical impacts to the environment associated with implementation of the 2040 General Plan are the focus of this environmental analysis. Physical changes could result from subsequent development pursuant to land use designations established in the 2040 General Plan, implementation of policies and implementation programs identified in the 2040 General Plan, and offsite or indirect development that is necessitated by the 2040 General Plan (e.g., new facilities, infrastructure upgrades). For the purpose of this environmental analysis, the types of actions that could result in physical changes to the environment under the 2040 General Plan are referred to collectively as “future development.”
- By analyzing the entire “program,” the draft EIR does address the direct and indirect impacts of the project.
- I9-8      The comment asserts that the General Plan policies would increase the cost of normal farming operations, which would “make it difficult for farming to remain profitable.” The comment does not provide clear link between this economic effect and physical environmental changes, such as conversion of farmland. EIRs are not required to treat a project’s economic or social effects as significant effects on the environment (State CEQA Guidelines, § 15131). The economic issues raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR. For further discussion of specific policies in the 2040 General Plan that could have an economic effect on farming operations, including programs that would provide economic support to agricultural operations, refer to response to comment I4-4.
- I9-9      The comment asserts that the impacts of “increased competition for water” are not adequately evaluated in the draft EIR but does not offer specifics about what information is missing or how consideration of additional materials could affect the environmental analysis. The commenter is referred to Section 4.10, “Hydrology and Water Quality,” for an evaluation of the potential effects of implementing the 2040 General Plan on groundwater and surface water quantity and quality, and Section 4.17, “Utilities,” for a discussion of water supply. See also response to comment I4-3. No changes to the draft EIR have been made in response to this comment.
- I9-10     This comment regarding the adequacy of the draft EIR is noted. However, no specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided. Refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Aubrey Sloan <asloan5119@gmail.com>  
**Sent:** Tuesday, February 25, 2020 4:14 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comments on draft General Plan

**Letter  
I10**

Ventura County RMA Planning Division,

I'd like to start by thanking the staff for putting this complicated document together and for receiving my input. My name is Aubrey E."Bud" Sloan, I am a local rancher with a significant stake in the outcome of this draft. My main concerns are the potential negative impacts on our county's history: local agriculture.

I10-1

After reviewing the draft EIR, I found Background Report on agriculture to be inadequate, vague and using outdated information. Many of the tables and figures, such as Fig 9-6, table 9-7 are using old data. While this older data can be important in providing background, the EIR references the Background Report as the current conditions, despite this data not being more current than 2015. The Background Report must be updated to reflect current data.

I10-2

There is also an issue with the map (Fig 9-7) which is of such poor quality that it cannot be used to show any information. This map must be replaced with a higher quality map.

Another major area that leaves the Background Report and document as inadequate is the lack of information around project water demand, supply and pumping costs. This is left out of the Background Report and the entire EIR. This must include analysis on the effects of increased competition of water supplies due to development planning in the General Plan.

I10-3

I ask that these issues be taken into consideration and addresses appropriately.

Thank you,  
Aubrey E."Bud" Sloan

**Letter  
I10**

**Aubrey E Sloan**  
February 25, 2020

- I10-1 This comment is introductory in nature and expresses concern related to local agriculture history. The comment does not raise a specific significant environmental issue for which a response is required.
- I10-2 The comment indicates that data presented in the Background Report and used to describe the existing setting for the analysis of potential impacts to agricultural resources in the draft EIR should be refined and updated to reflect the most current data available. Refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- The data of concern to the commenter includes Figure 9-6, a pie chart depicting the sources of water used for agriculture in 2013; Table 9-7, which provides a summary of the market value of agricultural products between 2005 and 2015; and Figure 9-7, which shows agricultural areas and watersheds for the entire



county with sufficient clarity to illustrate the spatial relationship between the resources. While this information provides context for the analysis in the draft EIR, it does not directly influence the analysis of potential impacts on farmland and agricultural resources pursuant to the thresholds of significance established in Appendix G of the California Environmental Quality Act Guidelines and the County's Initial Study Assessment Guidelines. Furthermore, the comment provides no evidence that the most current data would substantially differ from that presented or change the analysis in the draft EIR. The data characterizing agricultural land use in the county provides a reasonable representation of conditions to inform an analysis of potential effects. No revisions to the draft EIR have been made in response to this comment.

I10-3

The comment asserts that the Background Report and draft EIR do not adequately discuss water demand, supply, and pumping costs, and indicates that an analysis of the effects of increased competition for water should be included in the draft EIR. The commenter is referred to Section 4.10, "Hydrology and Water Quality," for an evaluation of the potential effects of implementing the 2040 General Plan on groundwater and surface water quantity and quality, and Section 4.17, "Utilities," for a discussion of water supply.

Pumping costs are not specifically discussed because EIRs are not required to treat a project's economic or social effects as significant effects on the environment (State CEQA Guidelines, § 15131). Social and economic effects need only be considered in an EIR where there is a clear link between those economic or social effects and physical environmental changes. The economic issues raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR.

Specific to the commenter's stated area of concern, increased pumping costs would only be relevant where there is substantial evidence that they would indirectly result in the loss of agricultural resources. As explained in the "Methodology" subsection of Section 4.1, "Agriculture and Forestry Resources," a reduction in available water resources for irrigation is considered an indirect impact on agricultural resources (see page 4.2-3 of the draft EIR). Indirect effects are evaluated under Impact 4.2-1 (Loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) in Section 4.2, "Agriculture and Forestry Resources," of the draft EIR. Consistent with the County's Initial Study Assessment Guidelines, the subsequent discussion focusses on indirect loss of agricultural soils and land use conflicts. The analysis concludes that the impact to farmland would be significant and unavoidable because "any direct or indirect loss of Important Farmlands would be considered a permanent loss of a valuable resource," and there "are no actions or policies that the County could feasibly mandate to fully replace the loss of Important Farmland" (see page 4.2-17 of the draft EIR). Additional discussion of potential indirect effects related to pumping cost would be speculative and would not significantly change the analysis or conclusions of the draft EIR. No changes to the draft EIR have been made in response to this comment.



FEB 27 '20 09:00

VIA ELECTRONIC MAIL: [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Letter  
I11

February 25, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I11-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I11-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I11-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

I11-4

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I11-4  
cont.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I11-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I11-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I11-7


In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I11-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I11-9

Sincerely,

  
915 Las Palmas Drive  
Santa Barbara, CA 93110

<b>Letter I11</b>	<b>Audrey H Fester</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I11-1 Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I11-2 Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I11-3 Refer to response to comment I4-3 regarding water availability and cost.
- I11-4 Refer to response to comment I4-4 regarding economic feasibility of General Plan policies that could affect agricultural operations.
- I11-5 Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I11-6 Refer to response to comment I4-6 regarding wildfires, fire prevention, and the County's Habitat Connectivity and Wildlife Corridor ordinances.
- I11-7 Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I11-8 The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I11-9 Refer to response to comment I4-9 and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Barb Miller <b.miller@verizon.net>  
**Sent:** Monday, February 24, 2020 2:48 PM  
**To:** General Plan Update  
**Subject:** General Plan

**Letter  
I12**

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to  
Spam.Manager@ventura.org

Dear Board of Supervisors:

No doubt about it. Climate change is here. According to a recent study of data by the Washington Post, with an average temperature increase of 2.6 degrees Celsius since preindustrial times, Ventura ranks as the fastest-warming county in the Lower 48 states.

However the good news is that General Plan Update gives us all the opportunity to begin workable and effective plans to mitigate it.

It is imperative that The Climate Action Plan (CAP) include the technical and scientific input needed for a meaningful CAP from teams qualified in solving the problem and able to produce a robust plan capable of meeting the greenhouse Gas (GHG) emission reduction goals.

Much of Climate change is caused by fossil fuel production and consumption. Ventura County needs to meet the goals of the Paris Climate Agreement, eliminating fossil fuel production and protecting its residents from harmful local pollution.

It's not going to be easy, but it's not easy to watch our county burn from climate change induced drought, or flood as a result of global warming. The crisis is upon us but so is the opportunity. I urge you to develop a general plan based on science and faces the crisis from climate change.

Thank you,

Barb Miller  
313 Manzanita St.  
Camarillo, C 93012

b.miller@verizon.net

I12-1

**Letter  
I12**

**Barb Miller**  
February 25, 2020

I12-1

The comment expresses a desire to address anticipated effects of climate change through the 2040 General Plan and is not related to the adequacy of the draft EIR. The comment states that the data and policies of the 2040 General Plan should be supported by science. Refer to response to comment I3-2 and Master Response MR-1 for discussion of the methods and science used to support development of the 2040 General Plan policies and programs related to greenhouse gas emissions.

The comment also asserts that to meet the goals of the Paris Climate Agreement, oil and gas production will need to be curtailed. See Master Response MR-4 for additional discussion of oil and gas production within the plan area and the 2040 General Plan's relationship to this industry.

**From:** Barbara Leighton <beleighton@yahoo.com>  
**Sent:** Sunday, February 23, 2020 8:08 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comment re: Draft VC2040 General Plan

**Letter  
I13**

**To: Ventura County Board of Supervisors**

**From: Barbara Leighton**

**4102 Greenwood St.**

**Newbury Park, CA 91320**

As a resident of Ventura County, I am very concerned about the future of our region and life on earth due to worsening climate change impacts.

Ventura County's General Plan is an opportunity to address these serious threats to human health and safety. If business as usual continues, impacts are bound to quicken the pace of becoming more and more severe. This is the time to make beneficial changes before conditions worsen – both locally and globally.

I agree with recommendations made by CFROG and the 350 Ventura County Climate Hub!

We need to muster our strength to shape a better future for generations to come. If we work together, I believe we can overcome the obstacles that block a thriving life-filled future.

Thank you for taking time to consider this matter carefully.

I13-1

<b>Letter I13</b>	<b>Barbara Leighton</b> February 23, 2020
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I13-1

The comment expresses a desire to address anticipated effects of climate change through the 2040 General Plan and is not related to the adequacy of the draft EIR. The description of the commenting individual and concern for the future of the region are noted. This comment does not raise a significant environmental issue for which a response is required. The commenter also refers to letters submitted by 350 Ventura County Climate Hub and Climate First: Replacing Oil & Gas. See responses to Letters O1 and O20, respectively.

**From:** Don and Beverly Denicola <de.nicola@cox.net>

**Sent:** Tuesday, February 25, 2020 2:52 PM

**To:** Curtis, Susan <Susan.Curtis@ventura.org>

**Subject:** County General Plan/EIR Comments

**Letter  
I14**

Ventura County Resource Management Agency, Planning Division

Attn: Susan Curtis, Manager, General Plan Update Section

800 South Victoria Avenue, L#1740

Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure –it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvoy

I support this letter-

Beverly Chambers de Nicola

I14-1

I14-2

I14-3

I14-4

<b>Letter I14</b>	<b>Beverly Chambers de Nicola</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I8. The responses below provide cross references to the portions of Letter I8 where responses to the same comments have already been provided.

- I14-1      Refer to response to comment I8-2 regarding the history of the McLoughlin family, and the adequacy of the 2040 General Plan and draft EIR.
- I14-2      Refer to response to comment I8-3 regarding roadway expansion, addition of bike paths and lanes, and the resulting loss of farmland and impacts related to farming operations.
- I14-3      Refer to Master Response MR-2 regarding the 2040 General Plan's consistency with the Save Open Space & Agricultural Resources Initiative.
- I14-4      Refer to response to comment I8-5 regarding analysis of economic issues in the draft EIR. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Don and Beverly Denicola <de.nicola@cox.net>  
**Sent:** Tuesday, February 25, 2020 2:54 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comments on General Plan/EIR

Letter  
115

Sanger Hedrick, Chair  
 Agricultural Policy Advisory Committee (APAC) County of Ventura  
 800 S. Victoria Blvd.  
 Ventura, CA 93003

**Re: 2040 General Plan Environmental Impact Report (EIR)**

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

I15-1

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time," (emphasis added). All mitigation measures proposed in an EIR must be shown to reduce impacts and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

I15-2

February 19, 2020



Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 2 of 4

- 7) 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
- 8) 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
- 9) 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

I15-2  
cont.

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

#### Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

I15-3

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (emphasis added).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 3 of 4

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

I15-3  
cont.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

I15-4

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little.... Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

I15-5

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

I15-6

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion. But the County fails to analyze or propose mitigation measures to address this significant impact.

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

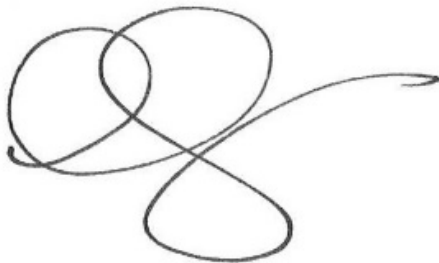
1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

I15-7

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director



In support of this letter-  
Beverly Chambers de Nicola

<b>Letter I15</b>	<b>Beverly Chambers de Nicola</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter A13. The responses below provide cross references to the portions of Letter A13 where responses to the same comments have already been provided.

- I15-1      The comment describes that the Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) has provided the following comments to the Agricultural Policy Advisory Committee describing issues with the draft EIR “that CoLAB believes will negatively impact the viability of local agriculture.” This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I15-2      Refer to response to comment A13-7 and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I15-3      Refer to response to comment A13-8 regarding the Right-to-Farm Ordinance and land use conflicts.
- I15-4      Refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I15-5      Refer to response to comment A13-10 regarding General Plan Policies AG-5.2 and AG-5.3.
- I15-6      Refer to response to comment A13-11 regarding water resources and loss of topsoil.
- I15-7      Refer to response to comment A13-12 regarding mitigation measure suggestions.

**From:** Don and Beverly Denicola <[de.nicola@cox.net](mailto:de.nicola@cox.net)>  
**Sent:** Tuesday, February 25, 2020 2:50 PM  
**To:** Curtis, Susan <[Susan.Curtis@ventura.org](mailto:Susan.Curtis@ventura.org)>  
**Subject:** General Plan / EIR Comments

**Letter  
I16**

To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Beverly Chambers de Nicola

I16-1

<b>Letter I16</b>	<b>Beverly Chambers de Nicola</b> February 25, 2020
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This comment letter repeats the same comments provided in Letter I6. The responses below provide cross references to the portions of Letter I6 where responses to the same comments have already been provided.

I16-1      Refer to response to comment I6-1, which discusses setbacks from freeways and high traffic roads as a way to reduce adverse air quality effects for sensitive receptors, and the feasibility of Mitigation Measure AQ-3 (Policy HAZ-10.X).

**From:** Don and Beverly Denicola <de.nicola@cox.net>  
**Sent:** Tuesday, February 25, 2020 2:57 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Cc:** Jimmy & Jane Chambers <costacasas@gmail.com>  
**Subject:** Comments on County General Plan/EIR

Letter  
117

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I17-1

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

I17-2

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I17-3

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.
2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.
3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."
4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.
5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

I17-4

I17-5

I17-6

I17-7

I17-8

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

I17-9

Sincerely,  
Beverly Chambers de Nicola

<b>Letter I17</b>	<b>Beverly Chambers de Nicola</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- |       |  |
|-------|--|
| I17-1 | Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County. |
| I17-2 | Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.                                   |
| I17-3 | Refer to response to comment I9-4 regarding the adequacy of the draft EIR.   |
| I17-4 | Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.               |
| I17-5 | Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.                                |
| I17-6 | Refer to response to comment I9-7 regarding the adequacy of the draft EIR.   |
| I17-7 | Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.               |
| I17-8 | Refer to response to comment I9-9 regarding water supply.  |
| I17-9 | Refer to response to comment I9-10 regarding the adequacy of the draft EIR.  |

Beverly Gutierrez  
 c/o Hoffman, Vance & Worthington  
 1000 S. Seaward Avenue  
 Ventura, CA 93001

Letter  
 I18

090  
 MAR 02, 2021  
 FEB 27 2020

February 24, 2020

Ventura County Board of Supervisors  
 Attn: RMA Planning Division  
 General Plan Update  
 800 Victoria Avenue L#1740  
 Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I18-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I18-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I18-3



The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I18-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I18-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I18-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I18-7

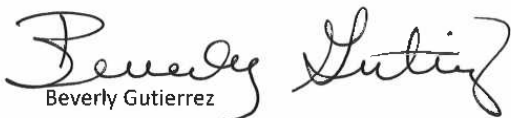
In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I18-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I18-9

Sincerely,

  
Beverly Gutierrez

<b>Letter I18</b>	<b>Beverly Gutierrez</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I18-1 Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I18-2 Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I18-3 Refer to response to comment I4-3 regarding water availability and cost.
- I18-4 Refer to response to comment I4-4 regarding economic feasibility of General Plan policies that could affect agricultural operations.
- I18-5 Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I18-6 Refer to response to comment I4-6 regarding wildfires, fire prevention, and the County's Habitat Connectivity and Wildlife Corridor ordinances.
- I18-7 Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I18-8 The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I18-9 Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

FEB 28 2020

Letter  
119

23 February 2020

RMA Planning Division  
General Plan Update  
800 Victoria Ave, L# 1740  
Ventura, CA 93009-1740

Dear Ms. Susan Curtis;

I am writing to you for the purpose of commenting on the EIR for 2040 which was recently released in the fall of 2019. A County's General Plan is one of the most important documents that a County produces. This document is flawed in so many ways which is due to the reality, EIR's take 12-18 months to complete and this one was finished in 6 weeks!! I have selected just a few issues, however, I want to state this entire EIR has failed to achieve its primary purpose, in sooooo many ways.

I19-1

#### **BACKGROUND REPORTS (BR)**

BR's are the basis of data used for analysis of impacts. The EIR refers throughout to the the BR as the source of data and technical information used in the analysis of impacts.

The EIR states that the BR contains substantive information used to conduct impact analysis. However, the BR actually only contains general, incomplete and often incorrect or generalized information that cannot be applied to the impact analysis. The BR fails to provide adequate technical information to be utilized as the County claims.

The maps provided in the EIR and the Background Report are of such low resolution and detail that they do not provide the reader with the information necessary to evaluate or determine impacts or even to determine which parcels or areas may lack sufficient site exposure for solar installations to be effective or feasible. Much of the data in the BR is outdated.

I19-2

#### **EXAMPLES:**

1. Map 9-7 is of such poor quality and resolution that it is impossible to read the words. A map of such poor resolution and quality does not meet the CEQA standard of providing adequate information so the reader can evaluate the County's analysis of impacts.
2. All the tables in the Ag Chapter contain outdated information- the most recent data cited is from 2015.

Page Two

**County fails to address the true impact on agriculture (lack of processing facilities and operations decreases economic sustainability of local ag.)**

In the BR, the County admits that while "Current trend is for locally grown" products, there are very limited opportunities for this in Ventura County due to the lack of processing facilities.

Processing operations are restricted because of County policies and regulations. The EIR did not analyze the impact of lack of processing facilities on agriculture. The County did not propose any mitigation measures to reduce this impact.

I19-3

**PROPOSE MITIGATION MEASURE:**

Allow for the construction and operation of agricultural processing facilities. The mitigation measure will reduce the impact of conversion of ag lands to non-ag uses by improving long term economic-sustainability for agriculture.

**COUNTY FAILS TO ANALYZE & REDUCE THE IMPACTS OF "ACTUAL" ISSUES.**

Actual issues impacting agriculture in Ventura County that contribute to the conversion of ag land:

1. Water
2. Economics (extremely expensive are to do ag)
3. Lack of farmworker supply and housing
4. Increased regulatory burden from increasing compatibility issues from urban/ag interface

I19-4

County analyzed **NONE** of these issues and proposed no mitigation to address any of these issues.

Thank you Susan for your time.

  
 Bruce Holley  
 Local Businessman  
 Oxnard, CA

<b>Letter I19</b>	<b>Bruce Holley</b> February 23, 2020
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- I19-1      This comment regarding the adequacy of the draft EIR is noted. However, no specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided.
- I19-2      The comment states that the 2040 General Plan Update Background Report contains incomplete and incorrect generalized information such that the reader cannot evaluate impacts or determine which parcels or areas may lack sufficient site exposure for solar installations to be effective or feasible. Refer to Master Response MR-6 for a discussion of the accuracy and timeliness of the information provided in the Background Report. Note that the EIR provides a programmatic evaluation of the 2040 General Plan and is not intended to support parcel-level analysis. For example, Figure 9-7 shows agricultural areas and watersheds for the entire county with sufficient clarity to illustrate the spatial relationship between the resources. The data characterizing agricultural land use in the County provides a reasonable representation of conditions to inform an analysis of potential effects. The commenter's reference to solar installations does not appear to be related to the adequacy of the draft EIR. Also refer to response to comment I10-2.
- I19-3      The comment suggests that the draft EIR should consider expanding the potential for the agricultural processing facilities through modification of the zoning ordinance as mitigation in the draft EIR. Refer to response to comment O32-24 regarding this suggestion.
- I19-4      The comment states that the draft EIR does not analyze impacts related to water, economics, farmworker housing, and compatibility issues from urban/agriculture interface. Refer to response to comment O32-15 for a discussion of where these issues are addressed in the EIR—with the exception of economic impacts, which are not required to be treated as significant effects on the environment (State CEQA Guidelines, § 15131). Mitigation measures are provided for significant impacts, as required by the California Environmental Quality Act. The comment does not provide specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR. Therefore, no further response is provided.

## Comments on Draft 2040 County General Plan and DEIR

Letter  
I20

Bruce Smith, AICP  
3457 San Pablo St.  
Ventura, CA 93003  
February 24, 2020

The following are my comments based on my cursory review of the Draft 2040 General Plan and DEIR:

### DRAFT 2040 COUNTY GENERAL PLAN:

#### Land Use and Community Character Element:

##### LU-3.3 Range of Uses in the Existing Community Designation (pg. 2-12):

This policy states in part: ...*"The County shall allow the appropriate zoning, population densities, and building intensities based on the adopted Area Plan or, where no Area Plan exists, by the applicable Existing Community Map contained in Appendix A. Because of the degree of specificity on the Existing Community Maps, the County shall require a General Plan amendment for any zone change within an Existing Community."* (Emphasis added)

It appears that the zoning maps and population density and building intensity tables for Existing Communities of the current General plan have not been included in Appendix A of the Draft General Plan. As such, the requirement for a General Plan amendment for any zone change within an Existing Community would be without legal basis, since there would be nothing to amend in the Draft General Plan. Although it could be argued that a zone change that is inconsistent with Table 2-1 of the proposed General Plan would require a General Plan Amendment, such zone changes could be potentially inconsistent with the Guidelines for Orderly Development (retain land uses and development at pre-established levels) and could cause potential impacts that have not been discussed in the DEIR.

Having no building intensity standards for Existing Communities would be inconsistent with the requirements of existing California General Plan law since these areas would have no building intensity standards (i.e., maximum lot coverage). (See comments regarding Table 2-2).

I20-1

**Table 2-1 General Plan Land Use Designations and Zoning Compatibility Matrix**

(pg. 2-19):

As I stated in my May 2019 comments on the Preliminary Draft, the RA (Rural Agriculture) zone is not compatible with the Agricultural designation and should be eliminated therefrom. The RA zone predates the adoption of the Agricultural designation of the current General Plan, is listed under the heading of “Rural Residential Zones” in the Non-Coastal Zoning Ordinance, and allows many land uses that are incompatible with the purpose of the Agricultural designation. For example, the RA zone allows:

- Assembly Uses
- Intermediate and Residential Care of 7 or More Persons
- Cemeteries and Accessory Crematories, Columbaria and Mausoleums
- Cultural Heritage Sites with Historic Repository
- Colleges and universities
- Schools, elementary and secondary (boarding and nonboarding)
- Correctional Institutions
- Libraries
- Mobilehome Parks
- Camps
- Campgrounds
- Golf Courses and/or Driving Ranges
- Recreational Vehicle Parks
- Retreats
- Recyclables Collection Centers

I20-2

Failure to eliminate the RA Zone from the Agricultural designation will potentially cause significant adverse impacts regarding the loss of agricultural soils/crops, is growth inducing, and is inconsistent with the purpose and intent of the SOAR Ordinance. The Draft EIR does not currently discuss or analyzed these impacts.

If for some reason the County seeks to allow the RA zone under the ECU-Agricultural designation (not subject to SOAR), then the purpose and intent should be clearly stated and any potential impacts discussed in the EIR.

**Table 2-2 Land Use Designations and General Development Standards (Pg. 2-21)**

As I stated in my May 2019 comments on the Preliminary Draft, this table contains no maximum lot coverage standards for the urban Residential Designations and contains a footnote stating: “*Maximum lot coverage is per appropriate County Zoning classification.*” However, the Non-Coastal Zoning Ordinance states that the Maximum Percentage of Building Coverage standard for each zone is: “*As determined by the General Plan or Applicable Area Plan.*” With the exception of the Saticoy Area Plan, all

I20-3



Area Plans and Existing Communities not covered by an Area Plan currently contain maximum lot coverage standards. Moreover, this table fails to make reference to LU-10.3 Maximum Lot Coverage Nonconforming Lots (pg. 2-39). Therefore, this table needs to be corrected to make reference to maximum lot coverage standards contained in the Area Plans, Existing Community tables of the current countywide General Plan, and LU-10.3.

In addition, it appears that the zoning maps and population density and building intensity tables of each of the Existing Communities outside of an Area Plan of the current countywide General Plan have been eliminated in the proposed General Plan. This creates an inconsistency with State General Plan law since the Existing Community areas outside of an Area Plan would have no building intensity standards (see preceding comment regarding policy LU-3.3) and makes the Draft General Plan internally inconsistent. Therefore, these zoning maps and population density and building intensity tables should be added to either Appendix A, or an expanded Chapter 11 to address both Area Plans and Existing Communities.

**ECU-Rural (ECU-R)** (pg. 2-28), first paragraph is confusing and subject to misinterpretation, and should be modified to read:

I20-3  
cont.

This designation applies within the boundaries of an Existing Community designated area and provides a physical transition between the outer edges of an Existing Community or Urban Area and nearby adjacent ~~a~~ Agricultural and ~~Open Space~~ designated areas and uses. The ECU-Rural designation generally applies to the outer edges of Existing Community and Urban Areas and around sensitive natural resources within the boundaries of an Existing Community designated area. Typical building types include large-lot single family homes in a rural setting.

**PARKS & RECREATION LAND USE DESIGNATION** (pg. 2-44) – *“This designation provides for parks and recreation facilities and associated recreation uses. The Parks and Recreation (PR) designation is only allowed in areas designated as Existing Community, Area Plans, or Areas of Interest under Policy LU-1.2.”* (Emphasis added)

This land use designation is apparently being created as a place saver for; 1) a future General Plan Amendment to actually designate specific properties with this designation and 2) a future Zoning Ordinance amendment to create a “REC” zone which would governing uses and development/operational standards.

Since the designation 1) only has a general description of allowed land uses (*parks and recreation facilities and associated recreation uses*), 2) the only development standard is *5% maximum lot coverage*, and 3) the designation is *allowed in areas designated Community, Area Plans, or Areas of Interest*, it is unclear how this designation is intended to be used. If the purpose is to change the land use designation of existing or planned parks and recreational facilities from Open Space, Agricultural, Rural, Existing Community and/or Urban designations to Parks and Recreation(PR), then that should be clearly stated. Moreover, the text of the Draft General Plan and Background Report should clearly state the current problem that the PR designation is intended to solve. In addition, it is unclear how the PR designation and the REC zoning would be consistent with the SOAR Ordinance on lands that are currently designated Open Space, Agricultural or Rural.

I20-3  
cont.

If the unstated purpose of the PR designation is that it should only be applied to lands that are currently designated Existing Community or Urban, then the reference to Area Plans should be qualified by Unincorporated Urban Center of said Plans. In addition, since the reference to Areas of Interest would mean that most of the south half of the County would be eligible for re-designation from Agricultural, Open Space and Rural to PR, such re-designations would generally require a countywide vote under the provisions of the SOAR Ordinance. Unless this is clearly the Board's intent, the reference to Areas of Interest should be eliminated.

**LU-12.1 Parks and Recreational Facilities** (pg. 2-46).

*"The County shall support the development of parks and recreation facilities within areas designated as Existing Community, Area Plans, or Areas of Interest."*

My comments regarding PARKS & RECREATION LAND USE DESIGNATION above, also apply to this policy. In addition, this policy seems overly broad in that a proposed park and recreational facility may have significant adverse, un-mitigatable impacts such as the loss of agricultural soils or the loss of natural resources. This policy, as worded, may prevent the County from denying such a project. The DEIR does not discuss these potential impacts.

I20-4

**Chapter 11 – Area Plans:**

The last paragraph on page 11-1 states: *"Table 11-1 shows the compatibility between land use designations in the countywide General Plan and Area Plans. The solid squares indicate a directly compatible relationship between the two designations, and the empty square indicates limited compatibility because of a restriction from the development standards."*

I20-5

State law requires that a General Plan (including Area Plans) be internally consistent. Table 11-1 is replete with errors and needs to be comprehensively reviewed and corrected, especially in light of the zoning compatibility matrix of each Area Plan and Table 2-1 of the Draft countywide General Plan. As an example, the table incorrectly shows several Urban Residential designations of the Area Plans to be directly compatible with the Rural, ECU-Rural, Agricultural, ECU Agricultural, Open Space, and ECU-Open Space designations of the countywide General Plan. In addition, the table incorrectly shows Rural Residential Designations of the Area Plans to be directly compatible with the Agricultural, ECU-Agricultural, Open Space, and ECU-Open Space designations of the countywide General Plan. Additionally, the Open Space designations of the Area Plans are incorrectly shown as being directly compatible with the Agricultural and ECU-Agricultural designations of the countywide General Plan. Other inconsistencies exist within the table as well.

Neither the text of Chapter 11 nor Table 11-2 explains what is generally or precisely meant by “...empty square indicates limited compatibility because of a restriction from the development standards.” Without explanation, this phrase is meaningless.”

Unless Table 2-1 is corrected, the proposed General Plan will be internally inconsistent, exposing the County to a significant legal challenge in court.

I20-5  
cont.

#### **Appendices:**

##### **Appendix A - Area Plan and Existing Community Land Use Maps:**

As I stated in my comments on Table 2-2, Appendix A should make reference to maximum lot coverage standards contained in the Area Plans, and include the maximum lot coverage standards of each of the Existing Communities in the current countywide General Plan.

General Comment regarding maps: Because of the scale of many of the maps, the Existing Community boundaries and land use designations within the Existing Community areas are unreadable and cannot be checked for accuracy. In addition, many of the land use designation labels on the maps are misplaced or unclear as to what parcels they apply to.

**Figure A-2: General Plan Land Use Diagram - Lake Sherwood/Hidden Valley Area Plan:** This map shows land use designations of some of the Existing Community areas that are within the Thousand Oaks Area Plan, which is confusing.

**Figure A-8: General Plan Land Use Diagram - Thousand Oaks Area Plan:** This map shows land use designations of some of the Existing Community areas that are within the Lake Sherwood/Hidden Valley Area Plan, which is confusing. In addition, the labels for land use designations within the Camarillo Area of Interest are unnecessary.

**Figure A-21: General Plan Land Use Diagram - North Simi Valley:** It is unclear what parcels the ECU-Open Space designation applies to since it is in an area that is outside of an Existing Community.

**Figure A-23: General Plan Land Use Diagram - Santa Susana:** The boundaries of the Existing Community along the north and northwest are confusing.

I20-5  
cont.

## DRAFT ENVIRONMENTAL IMPACT REPORT:

**6.5.2 Alternative 2: Existing Community and Urban Area Designations Alternative** (pg. 6-15):

**Third paragraph** states in part that *“Very Low Density or Low Density Residential lands outside of the Existing Community area designation (boundary) and Urban area designation (boundary) would remain the same as under the 2040 General Plan.”* (emphasis added). This is incorrect since the Very Low Density and Low Density Residential designations are only consistent with the Existing Community and Urban area designations, and are inconsistent with Rural, Agricultural and Open Space designations. Therefore, this sentence should be removed.

I20-6

**Pg. 6-16, Second paragraph, first sentence:**

This sentence states: *“In addition, this alternative would employ policy incentives and disincentives to focus future population, housing, and employment growth within the Urban and Existing Community area designations.”* The feasibility and effectiveness of these incentives and disincentives is highly questionable, especially the transfer of development rights from Rural, Agricultural and Open Space designated lands.

**Pg. 6-16, Fourth paragraph, first sentence:**

*“Overall population growth, housing, and employment projections for this alternative would be the same as under the 2040 General Plan.”* This sentence is confusing in light of the next sentence of the paragraph that states that this alternative: *“... would result in substantially higher rates of population and job growth within these area designations relative to the 2040 General Plan.”* Therefore, the first sentence should be deleted.

**Comparison of Significant Environmental Effects** (pg. 6-16)

First sentence states: *"This alternative would focus new development (e.g., more housing units, increase commercial square footage) anticipated to result from population growth that is forecast to occur over the life of the 2040 General Plan within a smaller disturbance footprint."* (emphasis added). This statement is illogical since the Draft 2040 General Plan's Very Low Density and Low Density Residential designated areas would be changed to more intense land use designations, which would result in greater disturbances to the existing physical and planned environment.

I20-7

Many of the other positive effects of this alternative seem to be based on the expectation of transfer of development rights from Rural, Agricultural and Open Space designated lands; however, there is no quantification of impacts and the benefits are based on an incentive that is highly speculative.

**6.5.3 Alternative 3: Dense Cores Alternative**

This alternative suffers from the same deficiencies as the preceding alternative: there is no quantification of impacts and the benefits are based on an incentive that is highly speculative.

I20-8

**Letter  
I20**

**Bruce Smith, AICP**  
February 24, 2020

I20-1

The comment asserts that any zone change under the 2040 General Plan could be inconsistent with the Guidelines for Orderly Development and could result in impacts not discussed in the draft EIR. Further, the comment asserts that lack of building intensity standards for Existing Communities would be inconsistent with the requirements of existing California General Plan law. The 2040 General Plan land use diagram establishes land use designations for the unincorporated county, including portions of the county within the Existing Community area designation. These land use designations do not change the land use zoning or building intensities on any properties compared to existing conditions; the designations were established based on the underlying zoning, thereby creating consistency. Any subsequent zoning amendment applications would also require update to the 2040 General Plan to maintain this consistency.

Future zoning amendments would be subject to review by the County. Potential for inconsistency with the Guidelines for Orderly development would be evaluated at the time the proponent applies for the zone change. The draft EIR has assumed that future development would be consistent with established regulations; the County has no basis upon which to speculate about future zoning amendments that could be inconsistent with the Guidelines for Orderly Development. Any such applications would undergo project-specific evaluation at the time the request is made.

Every location in the unincorporated county has a General Plan land use designation that includes an intensity maximum, as expressed by building footprint coverage. Population densities were intentionally omitted from the 2040 General Plan and are not required under State law. Refer to Master Response MR-2 for further discussion of the development potential (maximum density, intensity, and lot coverage) established by the land use designations in the 2040 General Plan.

I20-2

The comment states that the 2040 General Plan, Land Use and Community Character Element, Table 2-1, General Plan Land Use Designations and Zoning Compatibility Matrix (page 2-19), incorrectly identifies the Rural Agriculture zone as a compatible land use with the Agricultural land use designation. Planning Division staff have reviewed the existing General Plan Figure 3.2a, Zoning Compatibility Matrix, Non-Coastal Zones (page 73), and determined that identifying the Rural Agriculture zone as a new compatible land use with the Agricultural land use designation in Table 2-1 of the 2040 General Plan was recommended to the Board of Supervisors in error. The Planning Division will recommend that the Board of Supervisors correct this error in Table 2-1 during the adoption hearings for the final 2040 General Plan.

The comment also states that Table 2-1 indicates that the Rural Agriculture zone is a compatible land use with the proposed Existing Community-Agricultural (ECU-Agricultural) land use designation and asserts that the potential impacts of this compatibility should be analyzed in the draft EIR. By way of background, the draft EIR Section 4.11, "Land Use and Planning," indicates that the current Existing Community and Urban designations were retained as new area designations in the 2040 General Plan (page 4.11-9). Additionally, the Existing Community designation identifies existing urban residential, commercial, or industrial enclaves located outside Urban-designated areas. Furthermore, the County originally established the Existing Community designation to recognize existing unincorporated areas that have been developed with urban building intensities and urban land uses; to contain these enclaves within specific areas to prevent further expansion; and to limit the building intensity and land use to previously established levels to minimize incompatible land uses in these areas. The 2040 General Plan proposes to refine the Existing Community and Urban land use designations, as they currently exist in the current General Plan, by establishing new land use designations that provide more detailed information on the types of land uses (e.g., commercial, industrial, residential) that would be allowable within areas currently designated as Existing Community and Urban (Table 4.11-1). The draft EIR explains that these refined land use designations would result in future development that is consistent with the land uses, densities, and parcel sizes of Existing Communities based on current zoning (page 4.11-19).

The comment asserts that the potential impacts of deeming the Rural Agriculture zone compatible with the proposed Existing Community-Agricultural (ECU-Agricultural) General Plan designation should be analyzed in the draft EIR, and that such compatibility is "inconsistent with the purpose and intent of the [Save Open Space and Agricultural Resources (SOAR)] ordinance." The compatibility

of this zone classification and land use designation remains unchanged from the existing General Plan, Figure 3.2a, Zoning Compatibility Matrix, Non-Coastal Zones (page 73), which identifies the Rural Agriculture zone as a compatible with the Existing Community land use designation. Because the existing General Plan designation of all land that would be subject to the proposed ECU-Agricultural land use designation is Existing Community, none of the land is subject to the SOAR initiative measure which only applies to land designated Agricultural, Open Space, and Rural. Therefore, SOAR is not implicated and no additional analysis in the draft EIR is required to identify potential impacts of the compatibility of the Rural Agriculture zone and the Existing Community-Agricultural (ECU-Agricultural) land use designation. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopted a final 2040 General Plan.

- I20-3 The comment addresses the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Also refer to Master Response MR-2 describing the Parks and Recreation designation of the 2040 General Plan.
- I20-4 The comment cites Policy LU-12.1 in the 2040 General Plan, through which the County would “support the development of parks and recreation facilities within areas designated as Existing Community, Area Plans, or Areas of Interest” and asserts that this policy could result in a loss of agricultural and natural resources because it “may prevent the County from denying such a project.” First, Existing Community, Area Plans, and Areas of Interest are the portions of the county that are envisioned to accommodate the majority of the anticipated population growth over the 20-year planning horizon. These are the areas where populations that would use park facilities are located. They are not generally areas that support high-quality agricultural land or natural resources. Second, there is no reason that the County cannot both implement Policy LU-12.1 encouraging development of parks to serve existing communities and implement policies in the 2040 General Plan that protect agricultural and natural resources. Therefore, the commenter’s concern that Policy LU-12.1 would result in environmental impacts that are not evaluated in the draft EIR is speculative given the regulatory environment and the policies in the 2040 General Plan.

By analyzing the entire 2040 General Plan on a programmatic level, the draft EIR addresses the direct and indirect impacts of Policy LU-12.1. The comment does not raise a new or substantially more severe significant impact that was not already included in the draft EIR. No changes to the draft EIR have been made in response to this comment. Also refer to Master Response MR-2 describing the Parks and Recreation designation of the 2040 General Plan.

- I20-5 The comment provides suggested edits to the 2040 General Plan. Refer to response to comment O33-9 for discussion of the internal consistency of the 2040 General Plan and Area Plans. However, this comment is acknowledged for



the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. No further response is required.

I20-6

The comment makes several statements regarding the description of Alternative 2 in Chapter 6, “Alternatives,” of the draft EIR. In response to this comment, the third paragraph under in Section 6.5.2, “Alternative 2: Existing Community and Urban Area Designations Alternative,” on page 6-15 of the draft EIR is revised to read:

However, the land use diagram of this alternative would be different from the 2040 General Plan in the following ways. ~~Very Low Density or Low Density Residential lands outside of the Existing Community area designation (boundary) and Urban area designation (boundary) would remain the same as under the 2040 General Plan.~~ Very Low Density or Low Density Residential lands located within the Existing Community area designation (boundary) and Urban area designation (boundary) would be designated as Medium-Density Residential or Residential High-Density.

As noted by the commenter, Alternative 2 would accommodate the same projected population, housing, and employment increases in the unincorporated county as the 2040 General Plan. As indicated on page 6-16 of the draft EIR, these changes in the land use diagram would necessitate “changes in the zoning designations and minimum parcel sizes (suffices in the Zoning Compatibility Matrix) as well as updates to the development standards to ensure increases in lot coverages, reduced setbacks and parking requirements, increased building heights to a maximum of 45 or 50 feet to accommodate a minimum of 3-story development (such as podium parking with two-stories residential above) in order to allow the county to accommodate the same amount of forecasted growth as the 2040 General Plan within more compact areas.” In the draft EIR the County describes potentially feasible policies and programs that incentivize this development pattern would support implementation of this alternative. The commenter’s concern about the effectiveness of these programs is noted and no further response to this issue is required.

No edits have been made to the language in the fourth paragraph on page 6-16 of the draft EIR, which is excerpted below. Both of the following statements are correct.

Overall population growth, housing, and employment projections for this alternative would be the same as under the 2040 General Plan. The lands within the Existing Community area designation (boundary) and Urban area designation (boundary) would become highly urbanized communities featuring high density and intensity development that create substantial additional opportunities to accommodate new housing units and commercial, office, and mixed-use land uses, which in turn would result in substantially higher rates of population and job growth within these area designations relative to the 2040 General Plan.

I20-7 The comment questions a statement within the description of Alternative 2 that forecast growth would occur within a smaller disturbance footprint than development the 2040 General Plan. However, this statement is accurate. As explained in the draft EIR (page 6-16), this alternative would employ policy incentives and disincentives to focus future population, housing, and employment growth within the Urban and Existing Community area designations. As described in the response to comment I20-6, the draft EIR describes the following potentially feasible policies and programs that could implement this alternative:

The types of policies and programs that would be created or revised to focus development within these areas would include changing development impact fees, parking standards, and permitting timelines. County investments in new or upgraded public infrastructure and other public expenditures would be prioritized within Urban and Existing Community area designations and limited elsewhere. This alternative could also include use of a transfer of development rights programs in which land owners outside of Urban and Existing Community area designations would be compensated for redirecting their development rights to land within these areas (page 6-16).

Alternative 2 includes more than just a transfer of development rights program. The comment also does not explain why transfer of development rights programs are “highly speculative.” This alternative is a potentially feasible development alternative that would avoid or substantially lessen one or more of the significant environmental effects identified in the draft EIR. The California Environmental Quality Act (CEQA) does not require that alternatives analysis include quantification of impacts. The evaluation of Alternative 2 meets the CEQA standard for level of detail and permits a comparison between alternatives. A determination of feasibility ultimately rests with the decision-making body of the lead agency.

I20-8 The draft EIR provides an appropriately supported and reasoned assessment of potentially feasible alternatives. CEQA does not require that alternatives analysis include quantification of impacts. As indicated in response to comment I20-7, above, for Alternative 2, the draft EIR describes the potentially feasible policies and programs that could implement Alternative 3, including the same types of policies and programs described for Alternative 2 plus specified revisions to the land use diagram to further accommodate growth within targeted areas of the county. Alternative 3 includes more than just a transfer of development rights program. The comment also does not explain why transfer of development rights programs are “highly speculative.” The analysis of alternatives is comparative and is not required to provide an equal level of detail in the draft EIR as the evaluation of the 2040 General Plan.

To: Susan Curtis, Manager, General Plan Update, Susan.Curtis@ventura.org

Comments on COS-7.2 setback requirements for oil and gas wells, **DEIR for GPU 2040**

From: Carol Holly, 10508 Sulphur Mountain Road, Ojai, CA 93023

Proposed General Plan 2040 Policy:

- **COS-7.2: Oil Well Distance Criteria.** The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school. (RDR) [Source: New Policy]

The DEIR suggests a mitigation measure to the above policy to decrease the setback from schools (and to include day care centers) from 2500' to 1500'. The reasoning in the DEIR for this decrease in setback is to allow a potential operator in the future who perhaps wanted to drill an oil well without directional drilling to place the well on the drill pad anywhere they want. The DEIR stretches common sense with this argument. If the future operator can drill horizontally 1500' as stated in the DEIR, why not 2500'? There is a difference in the cost of drilling, but the risk to the health and safety of young children far outweighs the small economic cost to an operator or two.

I was an elementary school principal in Ojai Unified School District for 22 years. In my role, among other things, I was responsible for ensuring the health and safety of children assigned to my school. Many young children suffer from asthma and skin allergies. All children love to run and play at recess. It is critical that those sensitive children are protected from unwanted and unnecessary exposure to air toxins that may cause serious complications leading to poor school attendance and miserable days of recovery time.

In my last assignment before retiring, I was principal at a school with three classrooms of special needs children, some of whom were medically fragile and who suffered from life-threatening childhood illnesses. This latter group of children were often highly sensitive to changes in their environment and the reactions they suffered were sometimes immediate and very serious. I remember asking one mother of such a child, "when would you like me to call 911?" Her response was, "any time you want to." As chilling as that sounds, it was real.

Air toxins are dangerous to anyone in close proximity to the source of the emissions, but they are especially dangerous to young children. Children who are medically fragile may find them intolerable.

### **Bad Accidents Happen**

In 2006, oil well #36 in the Ojai Oil Field began spewing a mixture of brine water and oil at the rate of 210 gallons per minute (5 barrels) after a 3.1 magnitude earthquake on the San Cayetano Fault (see attached DOGGR report). Summit School at that time had a population of approximately 80 K-6 grade students. The school is cited about 1000' from well #36 (see attached map). The well continued to spew a toxic mix of brine water and unknown other

**Letter  
I21**

I21-1

I21-2

chemicals used in the capping process onto the land for three months. The well casing break was very difficult to get under control. Finally, after accruing a cost of 4 million dollars, the flow was stopped. During the entire time the well was being worked on by teams of international well control experts no one at the school was notified of the disaster unfolding on the hillside upwind from the school. Children continued to play on the playground, teachers taught physical education, parents with babies dropped off and picked up their students. **No one knew.** Where was the Ventura County Environmental Health Department? Where was DOGGR? Where was the fire department whose station is just a few hundred feet east of Summit School? Were any tests done on air quality near the school?

After the well was capped and the drill rigs and heavy equipment all cleared out, a parent of children at the school was told of the disaster by a worker from the oilfield. The story spread and we were collectively horrified. There was never any follow-up study or even a quick check-in to see how the children of Summit School were doing. No one knows if the school attendance went down, or if there are students with lasting health issues caused by breathing toxic chemicals for three months. No one knows because no one asked.

If staff and the industry assert in response to this comment that there is no evidence that anyone was sick or hurt by the break in well #36, be aware. How can there be evidence when 1) no one knew of the emergency in real time, 2) no studies were ever done to look for possible effects of the spill to human health at the school and 3) the air quality at the school was never tested?

A setback distance of 2,500', roughly 1/3 of a mile, is about all we can do to protect the health of young children at a school near active or idled oil and gas activities.

**I can assure you that no one with a medically fragile child would ever rent or buy a house 1500' from an active oil well if they could possibly avoid it, why would they have to send their child to a school 1500' from such a well?**

**Please reject the mitigation measure and retain the 2500' setback from schools and day care centers.**

Thank you,

**Carol Holly,**

**Retired Elementary School Principal, Ojai Unified School District,**

**MS Educational Administration**

I21-2  
cont.

<b>Letter I21</b>	<b>Carol Holly</b> February 27, 2020
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- I21-1 Refer to Master Response MR-4, Section MR-4.H “Buffers (Setback)” and Section MR-4.I “Directional Drilling,” regarding the findings and conclusions related to buffers (setbacks) and directional drilling in oil and gas operations.
- I21-2 The description of the commenting individual’s role and experiences as a principal in the Ojai Unified School District and the 2006 incident at oil well #36 in the Ojai Oil Field are noted. Based on these experiences and the effects of air quality impairment on sensitive receptors, the commenter expresses support for setback requirements between oil wells and schools. Refer to response to comment I21-1, above, regarding the effects of implementing General Plan Policy COS-7.2 (Oil Well Distance Criteria) related to health and safety.
- The comment also references attachments to the main body of the letter that documents details about the 2006 release from well #36. The County has reviewed the attachments and determined that they do not contain comment on the content or conclusions of the draft EIR, nor do they raise any significant environmental issues for which a response is required. All comment letters submitted to the County on the draft EIR are provided with complete attachments in Attachment 1 to this final EIR.
- Finally, the comment requests that the County “reject the mitigation measure and retain the 2500’ setback from schools.” As proposed in the 2040 General Plan, Policy COS-7.2 would require new discretionary oil wells to be located a minimum of 2,500 from any school. Based on the literature review and balancing the potential to hamper access to oil and gas reserves identified in Section 4.12, “Minerals and Petroleum Resources,” Mitigation Measure PR-1 would reduce the setback for schools to 1,500 feet. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Refer also to Master Response MR-4, Section MR-4.H, “Buffers (Setbacks),” for additional discussion of Policy COS-7.2, setback requirements, and Mitigation Measure PR-1.

FEB 27 '20 AM 9:00

Letter  
I22

Carolyn Diacos  
c/o Hoffman, Vance & Worthington  
1000 S. Seaward Avenue  
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I22-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I22-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I22-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I22-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I22-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I22-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I22-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I22-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I22-9

Sincerely,



Carolyn Diacos

<b>Letter I22</b>	<b>Carolyn Diacos</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I22-1      Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I22-2      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I22-3      Refer to response to comment I4-3 regarding water availability and cost.
- I22-4      Refer to response to comment I4-4 regarding economic feasibility of General Plan policies that could affect agricultural operations.
- I22-5      Refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I22-6      Refer to response to comment I4-6 regarding wildfires, fire prevention, and the County's Habitat Connectivity and Wildlife Corridor ordinances.
- I22-7      Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I22-8      The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I22-9      Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.



February 25, 2020

Letter  
I23

Ventura County Resource Management Agency, Planning Division  
ATTN Susan Curtis, Manager, General Plan Update Section  
800 South Victoria Avenue, L #1740  
Ventura, California 93009-1740

County of Ventura Draft Programmatic Environmental Impact Report for the Draft 2040  
General Plan Update

Dear Ms. Curtis,

The County of Ventura (County) is in a unique position to be updating the County's primary planning document through 2040 as the impacts of climate change are becoming more severe. The Draft Environmental Impact Report (DEIR) fails to recognize the true impacts of climate change already occurring. The County is already experiencing a 2.6°C increase in average temperature from historical records. We are soon to re-enter drought conditions following the driest February on record. We are still recovering from two of the state's largest wildfires in modern history. We must act now, and we must act boldly.

I23-1

The DEIR fails to provide enough emissions reductions to meet, or meaningfully contribute to, the California state mandated climate goals. The DEIR fails to include a Climate Action Plan with measurable targets and goals to ensure County stakeholders are informed about progress, achievements and accurate analysis of shortcomings. Language used in the proposed 2040 General Plan update such as "encourage" or "support" rather than "require" or "mandate" is insufficient and meaningless to meet acknowledged greenhouse gas reduction targets.

The DEIR is based on a wholly inadequate inventory of county emissions. The inventory was conducted from top down rather than bottom up and fails to include, or even consider, a significant portion of present emissions. Studies published recently indicate significant under-assessment of greenhouse gases, especially methane, from current fossil fuel extraction and production sources that must be included in the DEIR analysis.

I23-2

Because the County is one of the leading producers of fossil fuels in the state, and therefore in the nation, including fossil fuel facilities NASA documents as greenhouse gas "super emitters," the County must act now, and act boldly. Approval of the proposed DEIR would be a failure of the County's moral and fiduciary responsibility.

I23-3

Therefore, to act responsibly, the County must:

- 1) Declare a climate emergency and direct all County government offices to incorporate climate change mitigation, to the extent feasible, in all activities,

2) Create a Climate Action Plan 2020-2040 with measurable targets and outcomes as a separate document from the General Plan update,	I23-3 cont.
3) Set clear climate action goals and mandate enforceable climate policies based on the declaration of a climate emergency and Climate Action Plan 2020-2040, and	
4) As part of the Climate Action Plan 2020-2040, set five-year interval targets beginning with 2025 to immediately begin the reduction of the County's contribution to the climate emergency.	I23-4
a. Initial five-year (2025) emergency climate goals:	
i. Begin the elimination of fossil fuel extraction and production within the County by immediately prohibiting operation of fossil fuel facilities within one-mile buffer zones of schools, public parks, mobile home parks, medical facilities, or any residential zones,	
ii. Wind down discretionary oil and gas production by 10% per year to zero production in the County by 2030 starting with fossil fuel facilities within above one-mile buffer zones,	
iii. Prohibit flaring and venting from any fossil fuel infrastructure before 2025,	
iv. Implement a policy to coordinate with the California Department of Transportation (Caltrans) and the Ventura County Transportation Commission (VCTC) to cease all freeway, highway and road infrastructure expansion projects by 2025,	
v. Implement a policy to coordinate with Caltrans and VCTC to use the existing 101 Freeway, Highway 126, and Highway 23/118 corridors to build light rail for inter-city and inter-county commuting by 2040,	
vi. Implement a policy to expand existing rail infrastructure for multi-track capacity by 2040,	
vii. Implement a policy requiring all public transportation (buses, shuttles, and all County vehicles) to be fully electric vehicles by 2030,	
viii. Implement a County policy to prioritize walking and bicycling by connecting communities outside incorporated city limits with adequate walkways, bike lanes, and buffers from vehicle traffic,	
ix. Implement a policy to coordinate with contracted refuse companies to divert all pre- and post-consumer food waste into the "green waste" stream for composting all County-derived food waste by 2025,	

- x. Implement an agricultural policy requiring a transition to 100% regenerative farming including carbon sequestration and soil nutrient management plans by 2030,
- xi. Transition all small gas engines used in agriculture to electric models or diesel engines running on biodiesel produced from as locally-sourced waste vegetable oil as possible by 2030,
- xii. Implement a policy to transition all small, non-farm gas engines (i.e. blowers, mowers, trimmers, etc.) to electric models by 2025,
- xiii. Implement policies to facilitate distributed renewable energy generation and storage,
- xiv. Direct the County's Resource Management Agency to study the potential to repurpose existing gas infrastructure as conduit for undergrounding electrical and communication lines by 2025,
- xv. Direct the County's Chief Financial Officer to study the potential of public banking to finance County divestment from fossil fuels and investment in sustainable energy systems by 2025, and
- xvi. Implement a policy to include existing fossil fuel industry workers in the County's responsible transition to clean, renewable energy infrastructure.

I23-4  
cont.

Whatever price tag you want to envision for these proposals, it pales in comparison to the pending costs of sea level rise, soil degradation and crop failure, increased asthma and other heat-exacerbated medical conditions, and the shortsighted failures of free market economics and laissez faire County governance to deal with climate change. To delay action, to delay investment, will only cause greater harm and increased costs for us all.

I23-5

Respectfully,

Chad Christensen  
Ventura, CA

<b>Letter I23</b>	<b>Chad Christensen</b> February 25, 2020
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- I23-1      The comment states that the draft EIR does not recognize the true impacts of climate change already occurring or provide enough emissions reductions to meet the State's mandated climate goals. Chapter 12 of the Background Report is incorporated into Section 4.8, "Greenhouse Gas Emissions," of the draft EIR, which summarizes anticipated effects of climate change on Ventura County and provides a recent inventory of the county's greenhouse gas (GHG) emissions. Where feasible, the draft EIR estimates the anticipated emissions reductions from certain measures (displayed in Table 4.8-1) using Intergovernmental Panel on Climate Change's Global Warming Potential values from the most recent Fifth Assessment Report. The 2040 General Plan does include measurable targets for GHG reductions for 2030, 2040, and 2050 that are aligned with the State's legislative GHG reduction targets and other reduction goals (page 4.8-6, draft EIR).

The comment also states that language used in the 2040 General Plan policies is insufficient to result in meaningful reductions. In preparing the GHG analysis provided in the draft EIR, the County considered, and included references to, the proposed 2040 General Plan policies and implementation programs most applicable to the analysis. As explained in the methodology subsection in Section 4.8, "Greenhouse Gas Emissions," (page 4.8-7), the analyses evaluate whether the GHG reduction benefits of these policies and programs are supported by substantial evidence. Substantial evidence leading to estimates of GHG emissions resulting from implementation of the 2040 General Plan include both qualitative and quantitative assessments, consistent with Section 15064.4(a) of the State CEQA Guidelines. The draft EIR includes a detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county (pages 4.8-37 to 4.8-45).

Table 4.8-5, as revised in the final EIR, summarizes the policies and programs that would have quantifiable GHG reductions by 2030 (page 4.8-39). Implementation of the quantified policies and programs in Table 4.8-5 would collectively provide reductions of 168,065 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) by 2030, an approximate 11 percent reduction from forecast 2030 levels and 30 percent of the reductions needed to meet a target of 1,138,708 MTCO<sub>2</sub>e for consistency with emissions targets identified in Policy COS-10.2 (41 percent below 2015 levels by 2030). An additional 242,748 MTCO<sub>2</sub>e of reductions would be needed to close the gap with the 2030 target (page 4.8-40). For additional discussion refer to Master Response MR-1; Attachment 2 to the final EIR, which provides revisions the GHG calculations of draft EIR Appendix D; and final EIR Chapter 3, "Revisions to the draft EIR."

Other policies and programs of the 2040 General Plan would also result in GHG reductions but specific amounts cannot be determined at this time as described on pages 4.8-39. Qualitative analysis of the GHG reduction benefits of 43 programs included in the 2040 General Plan to reduce GHG emissions is provided in Table 4.8-6 (pages 4.8-40 to 4.8-43).

The draft EIR also includes seven feasible mitigation measures that address the potentially significant GHG emissions impacts of the 2040 General Plan (draft EIR pages 4.8-45 to 4.8-47). Thus, the draft EIR correctly identifies and considers 2040 General Plan policies and programs in the GHG emissions analysis conducted in the draft EIR and correctly includes feasible and enforceable mitigation measures in the draft EIR analysis of GHG emissions.

The draft EIR concludes, in its post-mitigation significance conclusion for Impact 4.8-1 (Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment), that the 2040 General Plan policies and recommended mitigation measures would not be sufficient to reduce GHG emissions to the established 2030 and 2040 reduction target because the policies, while supportive of future GHG reductions, do not contain enough specificity for their numeric contribution to the established 2030 and 2040 targets to be quantified. The draft EIR explains that:

No additional feasible mitigation has been identified at this time beyond the mitigation measures identified above and the policies and implementation programs of the 2040 General Plan. Under the 2040 General Plan future GHG emissions in the county would be on a downward trajectory compatible with State plans, policies, and regulations that would also result in GHG reductions in the county (page 4.8-52).

In Impact 4.8-2 (Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs) beginning on page 4.8-49), the draft EIR explains that the 2040 General Plan includes several implementation programs with a quantifiable effect on future GHG emissions, and a substantial number of additional programs and policies in every GHG emission sector that would result in further GHG emissions, although their effect on GHG emissions cannot be quantified at this program level of analysis. The 2040 General Plan policies and programs complement the main area of local government influence over GHG emissions, including renewable energy and energy efficiency, land use decisions, and local transportation infrastructure and policy. The available information that can be quantified demonstrates that future emissions in the county would be on a downward trajectory through 2050. Qualitative evidence shows that the many policies and programs that cannot be quantified at this time would lead to further GHG reductions and additional progress toward State GHG reduction targets. However, for these reasons and those described in Impact 4.8-1, the County cannot meaningfully quantify the effect of all its 2040 General Plan policies and programs on future GHG emissions, and therefore, cannot conclude, at this program level of analysis, that future GHG emissions in the unincorporated county under the 2040 General Plan would be sufficiently reduced to meet the State's 2030 or post-2030 targets.

Also refer to Master Response MR-1 for additional discussion of how the 2040 General Plan, its policies and programs, and draft EIR mitigation measures address GHG emissions.

I23-2      The comment states that the GHG inventory conducted for the County does not include a significant portion of present emissions from current fossil fuel extraction and production and states that unspecified recent studies indicate significant under-assessment of methane emissions. The commenter does not provide the study; therefore, the County cannot adequately address the science or findings of this reference. The GHG inventory prepared to characterize baseline emissions in the county is summarized in Table 4.8-1 of the draft EIR. This inventory provides estimates for stationary source emissions, which cover oil and gas extraction activity within the county. The commenter is correct that fugitive methane emissions have been reportedly undercounted by certain studies; this inventory was conducted using the most current science and reporting available. Refer to Master Response MR-1 for additional discussion of fugitive methane emissions and how stationary sources were included in the GHG inventory.

I23-3      The comment requests that the County declare a climate emergency, prepare a Climate Action Plan for 2020-2040 that is separate from the 2040 General Plan, and set clear climate action goals and mandate enforceable policies. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and

qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county (draft EIR pages 4.8-37 to 4.8-45), and seven feasible mitigation measures that would address the significant GHG emissions impacts of the 2040 General Plan and further reduce GHG emissions in the county (draft EIR pages 4.8-45 to 4.8-47).

The 2040 General Plan sets GHG reduction targets at 10-year intervals that were developed in consideration of statewide GHG reduction targets and other reduction goals. Because the 2040 General Plan encompasses policies and targets that would similarly be contained in a standalone Climate Action Plan, the 2040 General Plan can be used in the same way to reduce countywide emissions.

Regarding the concept that “declaration of climate emergency” should be the basis for the County’s climate goals and policies, note that local emergency declarations are made by the governing body or a designated official and are part of a relatively short-term response effort (see, e.g., Gov. Code, §§ 8550 et seq. [California Emergency Services Act]). Because an emergency declaration is a quasi-legislative act authorizing the short-term exercise of extraordinary governmental powers, it would occur separately from the 2040 General Plan policies, which would guide County actions through 2040.

The comment is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

I23-4

The comment directs the County to set 5-year interval reduction goals and lists strategies to reduce emissions. Implementation Program AA in the Conservation and Open Space Element of the 2040 General Plan would require updates to the GHG emissions inventory to track GHG reduction performance at 5-year intervals. In addition, many of the policy suggestions in the comment have been considered in development of the 2040 General Plan.

These suggestions are noted and are generally congruent with the types of policies and programs included in the 2040 General Plan and analyzed in the draft EIR. The 2040 General Plan includes policies and programs to facilitate alternative transportation modes including public transit (Policies HAZ-10.6 and HAZ-10.8); policies that would reduce food waste (Policy PFS-5.4); policies that encourage sustainable farming (AG-5.1 through AG-5.3), including Policy AG-5.2 that would support the transition from fossil-fuel-powered equipment to electric- or renewable-powered equipment and Program AG-L to sequester carbon through changes in farming practices; as well as policies to increase use of renewable energy (Policies COS-8.1 through COS-8.11). Refer to Master Response MR-4, Section MR-4.J, “Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations),” regarding the suggestion that the County prohibit petroleum extraction. Because this comment is not related to the adequacy of the draft EIR, no further response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

- I23-5** The statement comparing the costs of the strategies suggested in comment I23-4 to the costs of several anticipated climate change impacts is noted. This comment is a concluding statement and does not raise a significant environmental issue for which a response is required.

**From:** chris raymond <raymond.chrisj@gmail.com>  
**Sent:** Wednesday, February 26, 2020 3:16 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Cc:** chris@rinconstrategies.com; llampara@colabvc.org  
**Subject:** 2040 General Plan Draft EIR Comment

**Letter  
I24**

The County did not conduct complete analysis on impacts of creating a new source of glare for motorists.

The General Plan contains policies that require installation of solar panels and the creation of "reflective" roof tops.

Policy PFS-2.2: Sustainable Community Facility Design. The County shall encourage the incorporation of sustainable design features in community facilities to reduce energy demand and environmental impacts, such as reflective roofing, permeable pavement, and incorporation of shade trees.

Implementation Program U: Solar Canopies in Non-Residential Projects. The County shall amend the County's Coastal and Non-Coastal Zoning Ordinances to require parking lots for new non-residential construction projects, with floor area of greater than 50,000 square feet, to include solar canopies.

Yet these policies were not analyzed for impact even though they will both create new sources of glare.

Even with Mitigation Measure AES-1 (requiring that materials that reduce glare be used), how do you have a "reflective" roof and use "reduced glare" materials? By the very definition of "reflective", glare will be produced.

Also, has the County evaluated whether "non-glare" solar panels are technologically or economically feasible?

I24-1

**Letter  
I24**

**Chris Raymond**  
February 26, 2020

- I24-1** The comment asserts that the draft EIR does not include a complete analysis related to glare impacts by stating that Policy PFS-2.2 and Implementation Program U would result in new sources of glare that were not evaluated. Policy PFS-2.2 encourages incorporation of design features that promote sustainability in new development, and Implementation Program U in the Conservation and Open Space Element would require solar canopies on certain non-residential developments.

Impact 4.1-3 (Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network) analyzes the glare impacts of the 2040 General Plan on motorists. The analysis describes the policies of the 2040 General Plan and provisions of the Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance that would reduce potential glare impacts, and concludes that while these policies and provisions

would generally reduce glare impacts, there would be still be limited circumstances in which future development would include reflective materials such as metal or glass and be visible from one or more Regional Road Network (RRN) roadways such that discomfort or disability glare for motorists traveling along an RRN roadway could occur (page 4.1-27).

The draft EIR identifies Mitigation Measure AES-1 for this potentially significant impact. This measure would establish an implementation program through which applicants for future discretionary development projects that include use of reflective surfaces which the County determines would potentially be visible to motorists traveling along the County RRN would be required to submit a detailed site plan and list of project materials to the County for review and approval. If the County determines that the project would include materials that would produce disability or discomfort glare for motorists, the County will either require the use of alternative materials or require that the applicant submit a study demonstrating that the project would not introduce a source of substantial glare. Through this process, it is expected that sustainable design features encouraged in Policy PFS-2.2 that conflict with the requirements of Mitigation Measure AES-1 would be eliminated or revised through design of the project because the requirement of Mitigation Measure AES-1 to evaluate and address glare generated along the County RRN would supersede the County's encouragement of building elements where they are found to generate such impacts at the project-level. Design could be modified by, for example, relocating a parking lot required to orient solar canopies to avoid glare impacts to a regional roadway. The technological and economic feasibility of sustainable design features encouraged in the 2040 General Plan would be determined at the project level for individual development applications.



**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Monday, February 24, 2020 7:38 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I25**

**You have a NEW Comment**

**Name:**

Christina Pasetta

**Contact Information:**

Christina.Pasetta@patagonia.com

**Comment On:**

No flares that will be wasteful and pollute our air.

**Your Comment:**

Flares are wasteful and polluting. End this practice and do the real work of deconstructing this infrastructure. I I25-1

<b>Letter I25</b>	<b>Christina Pasetta</b> February 24, 2020
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I25-1      Refer to Master Response MR-4, Section MR-4.F Flaring, regarding the findings and conclusions related to flaring in oil and gas operations.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Thursday, February 20, 2020 7:41 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I26**

**You have a NEW Comment**

**Name:**

Christina Pasetta

**Contact Information:**

Christina.pasetta@patagonia.com

**Comment On:**

Oil and Gas buffer zone minimums

**Your Comment:**

2500 feet is still too close to people and shared spaces for these polluting and destroying entities but that is the minimum we can demand as a buffer zone for these oil and gas extractive and explorative practices. I I26-1

No more oil. I I26-2

<b>Letter I26</b>	<b>Christina Pasetta</b> February 20, 2020
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- I26-1 Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.
- I26-2 Refer to Master Response MR-4, Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations) regarding the findings and conclusions related to phasing out the oil and gas industry.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 26, 2020 12:32 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I27**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### You have a NEW Comment

**Name:**

Christine Brennan

**Contact Information:**

christinebrennan65@me.com

**Comment On:**

climate Action Plan

**Your Comment:**

I am a 30 year resident of Ojai. I am currently a board member of Ojai Trees a nonprofit tree planting organization. I am alarmed at the current climate change rate and fully endorse CFROG additions to the plan. Climate change is caused by fossil fuel production and consumption. The CAP addresses the consumption side by merely encouraging, but not requiring, electric fuel vehicles and clean power for homes and businesses. But Ventura County is the third largest oil and gas producing county in California. As such, we must do our part to reduce oil production through thoughtful, rigorous policy to phase it out. This is not addressed.

I27-1

<b>Letter I27</b>	<b>Christine Brennan</b> February 26, 2020
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- I27-1      The description of the commenting individual's participation in Ojai Trees and concerns regarding climate change in Ventura County are noted. This comment does not raise a significant environmental issue for which a response is required. The commenter refers to a letter submitted by Climate First: Replacing Oil & Gas. See responses to Letter O20. Also, refer to Master Response MR-1 regarding greenhouse gas reduction planning concerns.

**From:** Christopher Tull <info@email.actionnetwork.org>  
**Sent:** Wednesday, February 19, 2020 9:46 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Please make strong climate policy!

Letter  
I28

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to [Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather. I want strong climate policy and a goal to be carbon neutral by 2045.

I28-1

My family and community are counting on you to make a strong plan that helps us mitigate climate impacts. With tipping points accelerating, we cannot go halfway! We want courageous leadership to set goals we can hang our hopes and efforts on.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I28-2

I want policies like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and effective benchmarks for reducing emissions from tailpipes.

I28-3

I want an EIR that covers major climate impacts and a systematic plan that will assure carbon neutrality no later than 2045.

Thank you—

Christopher Tull  
[ctull17@gmail.com](mailto:ctull17@gmail.com)  
 446 Deodar Ave.  
 Oxnard, California 93030

My family and community are counting on you to make a strong plan that helps us mitigate climate impacts. With tipping points accelerating, we cannot go halfway! We want courageous leadership to set goals we can hang our hopes and efforts on.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I want policies like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and effective benchmarks for reducing emissions from tailpipes.

I want an EIR that covers major climate impacts and a systematic plan that will assure carbon neutrality no later than 2045.

Thank you—

Christopher Tull  
[ctull17@gmail.com](mailto:ctull17@gmail.com)  
446 Deodar Ave.  
Oxnard, California 93030

<b>Letter I28</b>	<b>Christopher Tull</b> February 19, 2020
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This comment letter repeats many of the same comments provided in Letter I3. The responses below provide cross references to the portions of Letter I3 where responses to the same comments have already been provided.

- I28-1      Refer to response to comment I3-1 regarding the commenter’s concerns about climate change and the draft EIR analysis.
- I28-2      Refer to response to comment I3-2 regarding the use of current climate change science in the draft EIR analysis.
- I28-3      The comment calls for certain GHG reducing policies. Refer to response to comment I3-3 for a discussion of these suggestions.

**Letter  
I29**

Ventura County Board of Supervisors ,

206 people have signed a petition on Action Network telling you to Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR.

Here is the petition they signed:

With worsening climate change impacts, we reiterate and amplify the concerns the people expressed in January of last year about “climate change and GHGs, and the effects of continued oil and gas extraction including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards.”

Our county is warming faster than any other in the nation, our ocean is becoming more hostile to marine life, our last drought was the most intense and lasted longest, and our history of costly floods will be dwarfed when future atmospheric rivers pour over our valleys. Our house is on fire. We need a thorough plan and environmental impacts analysis based on the latest science.

Ventura County’s plan matters. Our larger cities are making climate action plans and look for your example of leadership. The environmental impact from what we do to mitigate climate impacts at the global scale is profoundly influential in trying to stop runaway climate change. This is explained in a new report Insights from the California Energy Policy Simulator about the role of the State of California in the world. Ventura County as a local government hit hardest by climate impacts must step up and meet serious goals. “Insights about California’s climate policies are at the forefront of global efforts to battle climate change. The state’s leadership and success so far have helped maintain momentum despite political headwinds. If California faltered, global efforts to reduce GHG emissions would be dealt a major setback. Meanwhile, the severe risks from runaway global warming are becoming more tangible as the state suffers from wildfires supercharged by climate change.”

A. Four Overall Comments:

We are grateful for the expertise at the law firm of Shute, Mihaly and Wineberger retained by CFROG regarding CEQA. We have appreciated their past comments. We join them in continuing to request the following:

1. Count ALL GHGs that result from activity in our county: Count all burning of oil and gas originating in our county and count all fugitive methane from wells in our county and from methane entering our county that was not counted at the jurisdiction of origin. Do the math on the GHG footprint for heavy exports. We want to mitigate our fair share of all climate impacts from activities within Ventura County. We have to know what they are. Worrying about double counting is not acceptable. Just worry that you haven’t counted every cause of climate impacts that we are morally and legally responsible to mitigate with a comprehensive inventory and a systematic plan.

2. Use the latest science to calculate GWP of methane: The global warming potential of GWP is nearly 40 percent greater than what you are using. The International Panel on Climate Change states that over a 20 year period, methane has a GWP of 84 compared to carbon dioxide (up from their previous estimate of 72). The US EPA estimates it at 87 and recent scientific experts put the estimate at 96. We must know the true environmental impact of methane emissions. A complete and scientifically valid GHG inventory is required for a CEQA-compliant Climate Action Plan.

3. Use the emissions reduction goal from Governor Brown’s Executive Order B-18-55 “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing greenhouse gas emissions.” It is an inadequate compromise, but not as much as the SB 32 goal of 80% below 1990 levels by 2050. City of LA plans to stay within a net zero carbon budget between now and 2045. The proposed GHG reductions in the VC2040 Draft of 41 percent below 2015 levels by 2030, 61 percent by 2040, and 80 percent by 2050 are not ambitious enough for us to do our part to mitigate the climate chaos happening faster than scientists have predicted.

I29-1

I29-2

I29-3

I29-4

I29-5

4. Policies and programs must meet the goal: It does not take an in-depth analysis to see that this plan will not achieve the 2030 goal of 40% reduction in GHGs below 1990 levels. A new report Insights from the California Energy Policy Simulator shows that the State of California will fall short of that goal by at least 15 and as much as 45 MMT CO <sub>2</sub> e. We have and continue to advocate for a goal aligned with Governor Brown's Executive Order to achieve carbon neutrality as soon as possible and no later than 2045.	I29-6
<b>B. Some Comments about Impacts and Mitigation</b>	
The environmental impacts that concern us are those resulting from governments not making and carrying out plans to mitigate climate change. Your draft analysis does not include most of them. Table B in the Executive Summary is not even half finished. Some of the more serious impacts are missing from the draft analysis. Here are a few of our concerns:	I29-7
1. Aesthetics, Scenic Resources and Light Pollution and Agriculture and Forest Resources: Mitigation programs are needed to protect our resources from degradation from significant climate impacts. The loss of soil in particular is associated with the downfall of civilizations.	
2. Air Quality: The emissions impacts from exceeding criteria pollutant thresholds and also greenhouse gases seem significant and can be mitigated.	I29-8
3. Biological Resources: The new implementation program is a good start to "update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria and evaluate discretionary development that could potentially impact sensitive biological resources". Two kinds of impacts are missing. 1) Climate Change. A major mitigation is the restoration of wetlands which should be at a 2:1 or greater ratio. Stormwater management is another mitigation that reverses the loss of vegetation from drought and floods and supports the restoration of all of the indigenous biology that makes an ecosystem function to maintain the small water cycles. 2) Toxic Pesticide and Herbicide Use and Drift. This must be part of the agenda of a Program for Protection of Sensitive Biological Resources to promulgate the mitigations provided by Integrated Pest Management. Pest management policy must align with the recommendations of the California Department of Pesticide Regulation Roadmap for Integrated Pest Management some of which have climate mitigation co-benefits.	I29-9
4. Energy: We want a workshop to learn how it is deemed less than significant to allow wasteful. Inefficient, or unnecessary consumption of energy resources.	I29-10
5. Greenhouse Gas Emissions: The climate change impacts are so dire that the mitigations need to be benchmarked to be achieved before it is too late to reverse runaway climate chaos. At minimum we demand a systematic plan for decarbonization of county facilities and electrification of the transportation system.	I29-11
6. Hazards, Hazardous Materials, and Wildfire: The impacts of toxic explosions, leaks, and spills and the drift of regulated materials and the ignorance of the public about toxic impacts must be addressed where feasible through mitigations that regulate the use and transport of hazardous materials. We have recommended feasible mitigations for people being exposed to the risk of wildfires that have not been accepted by decision-makers.	I29-12
7. Hydrology and Water Quality: Impacts from climate change and poor land management have have led to grave threats to water supply and water quality. These are highly significant--ground water overdraft, overuse and degradation of water quality, erosion, flooding, and siltation. (Impact 4.10-12) The failure to restore small water cycles to keep stormwater in the uplands and maintain forest health is one of the most serious impacts being mitigated in many places through a paradigm shift about stormwater management. Mitigation is essential--water is life. It requires an integrated water management plan that involves every sector working on every mitigation of which we are aware.	I29-13
8. Land Use and Planning We want an analysis of incompatible land uses and new development with negative health implications. Closing wells near sensitive sites is a mitigation. Environmental Justice is not examined in the draft EIR.	I29-14
9. Mineral and Petroleum Resources: We want an analysis of the impact of the scenario in which wells have been put on hold and the operator cannot close the wells for lack of funds. We have no choice. The wells must be closed properly. Fields must be restored to functioning ecosystems to help mitigate climate change impacts. We need insurance as well as bigger bonds.	I29-15
10. Traffic and Transportation: Tailpipe emissions is an extremely significant environmental impact. The mitigation aimed for in the CTM-C: Vehicle Miles Traveled (VMT) Reduction Program needs assurances of effectiveness via a clear description of what "conditions warrant providing additional mitigations and programs"? This is far too vague to be a mitigation for this significant impact. We have no alternative but to reliably cut GHGs in the transportation sector.	I29-16
	I29-17

11. Utilities: Failure to develop wholesale and commercial scale renewable energy generation and microgrids is a significant environmental impact because it has forced us to have to get our electricity from fossil fuels via transmission lines that spark wildfires. Community microgrids are a feasible mitigation.	I29-18
12. Waste Management: Failure to properly manage waste has a highly significant environmental impact, especially when it produces methane super-emitter landfills that is driving climate change, but also the failure to reuse and recycle consumer goods and the materials and equipment discarded by commercial enterprises. We need a more comprehensive approach for mitigation of these impacts.	I29-18
C. The following policy recommendations for the Draft Plan could help the Plan achieve the GHG reduction goals to mitigate climate change impacts and help the EIR be more relevant to the climate crisis.	I29-19
Land Use and Community Character: We endorse the comments submitted by Bruce Smith to more firmly assure preservation of agricultural land and open space. We point out the lack of analysis of Environmental Justice policy issues.	I29-20
Circulation, Transportation, and Mobility:	
1. No overriding considerations should allow a project to NOT reduce VMT unless all of the vehicles have zero emissions that will use the proposed project.	I29-21
2. CTM 3-9 to widen SR 118 has a significant environmental impact.	I29-22
3. Benchmarks to reduce VMT need to be more clear and the plan needs a review with public input every two years until 2028 and then no longer than every five years.	I29-23
4. Parking programs should be included in ways that reduce single-occupancy car trips.	I29-24
Public Facilities, Services, and Infrastructure:	
1. Enroll residents in a program to reduce CO2 emissions in their neighborhoods. Ex: Cool Block or Transition Streets.	
2. PFS 2.1 must be revised to say include rather than encourage 'Sustainable Plans and Operations' in order to be considered a mitigation of climate change impacts from greenhouse gas emissions.	I29-25
3. Policy PFS 7.1 should be revised to delete the need for access to gas. The environmental impact from use of natural gas requires carbonizing buildings beginning with no gas connections to new residences . It is therefore contradictory to ensure access to gas.	
4. Local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. This is not the same as "Smart Grid Technology". You need experts who know the cutting edge of this field to help write coherent policy on this topic.	I29-26
5. Zero Waste The County shall achieve zero waste (via a suite of policies to reduce, reuse, and recycle) with no organic waste going to landfills by 2023	
6. Zero Waste Policy for Meetings and Events Design and implement a zero waste policy for meetings and events sponsored or permitted by the County to minimize waste and rescue surplus edible food	
7. Compostable Take-Out Foodware Require that take-out foodware be made with material compostable in solid waste processing facilities within 60 days	I29-27
8. Reduce Solid Waste by Phasing Out Single-Use Plastic Evaluate how to best reduce solid waste generation per capita by at least 15% by 2030 including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene	
9. Ban Expanded Polystyrene	



Conservation and Open Space:

1. Reduce oil and gas production by 40% by 2025 via higher monitoring standards and 2500 ft buffer zones near sensitive sites; reduce production to zero by no later than 2040.
2. Phase-Out of Oil and Gas Production The County shall prohibit new drilling and shall regulate existing wells to assure steady closing of wells beginning near residential and commercial areas.
3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.
4. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.
5. Detect and curb methane emissions from “super-emitter” sites as identified by NASA.
6. Tax oil and gas production, and related uncaptured methane to raise the needed revenues to fund urgent climate programs to replace high-emission vehicles with a priority on trucking and freight companies, fishing businesses, general contractors and K-12 schools.
7. Require a fully accountable performance bond for all new wells to cover cost of closure Cite LAT article (maybe put on website and link to it).
8. Establish an insurance fund that oil and gas producers contribute to that will cover accidents and closing wells if the producer goes bankrupt.
9. Ban gas-fueled lawn and garden equipment. (Ex: City of Ojai)
10. Accelerate capture of legacy HFCs Enlist the public and private to find and destroy existing stocks of HFC’s (refrigerant gases with extremely high Global Warming Potential).
11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.
12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.
13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.
14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.
15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.
16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30%by 2030.
17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.
18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.
19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

I29-28

I29-29

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.

2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N<sub>2</sub>O) emissions and nutrient runoff.

3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.

4. Reward Regenerative Farmers with Digestate and Compost from Food Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO<sub>2</sub>.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035

2. All rainfall must be retained onsite in soil and reservoirs.

3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.

4. Recycle all wastewater for beneficial reuse by 2035.

5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.

6. Close oil and gas wells and injection wells near aquifers as a top priority.

7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.

8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.

2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.

3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.

4. Maritime Economy. Facilitate a sustainable maritime economy using restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.

I29-30

I29-31

I29-32

5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.

6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.

7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.

8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

You can view each petition signer and the comments they left you in the attached PDF.

Thank you,

Christopher Tull

I29-32  
cont.

I29-33



Sent via Action Network, a free online toolset anyone can use to organize. [Click here to sign up](#) and get started building an email list and creating online actions today.

<b>Letter I29</b>	<b>Christopher Tull</b> February 27, 2020
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- I29-1 Refer to the response to comment O1-1. The comment introduces a petition to the Ventura County Board of Supervisors regarding the 2040 General Plan and draft EIR. This petition was also submitted by 350 Ventura County Climate Hub. See responses to Letter O1 for a discussion of the concerns raised in this petition. The 206 signatories are acknowledged for the record. Comment letters submitted to the County on the draft EIR are provided with complete attachments in Attachment 1 to this final EIR.
- I29-2 The comment reiterates general concerns from the petition about the effects of ongoing oil and gas extraction. These concerns are acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- The comment also summarizes the foreseeable environmental changes associated with anthropogenic climate change and emphasizes the need to conduct environmental impact analysis using the latest science. See response to comment I28-2 for a discussion of the methodology used to evaluate greenhouse gas (GHG) emissions for baseline conditions and future target years in the draft EIR. The comment summarizes more detailed comments provided elsewhere in the comment letter. See responses to comments I29-3 and I29-4, below.
- I29-3 Refer to response to comment O1-2 for a discussion of GHG emissions and the global warming potential of methane.
- I29-4 Refer to response to comment O1-3.
- I29-5 Refer to response to comment O1-4. The comment summarizes more detailed comments provided elsewhere in the comment letter. See responses to comments I29-6 through I29-18, below, regarding impacts and mitigation measures.
- I29-6 Refer to response to comment O1-5.
- I29-7 Refer to response to comment O1-6 for a discussion of programs to protect scenic resources and agriculture and forest resources from degradation due to significant climate impacts.
- I29-8 Refer to response to comment O1-7 regarding criteria air pollutant emissions.
- I29-9 The comment asserts the new implementation program does not include impacts as a result of climate change and should include mitigation regarding the restoration of wetlands and stormwater management. Refer to response to comment O1-8, which explains that EIRs are not required to include an analysis of impacts that are a result of climate change.

- I29-10 Refer to response to comment O1-9 for an explanation of why the draft EIR correctly omits analysis of the impacts of pesticide and herbicide use on biological resources.
- I29-11 Refer to response to comment O1-10 for a discussion of the energy consumption analysis in the draft EIR.
- I29-12 Refer to response to comment O1-11 regarding GHG mitigation.
- I29-13 Refer to response to comment O1-12 for a discussion of the evaluation of potential hazards included in the draft EIR.
- I29-14 Refer to response to comment O1-13 regarding hydrology and water quality.
- I29-15 Refer to response to comment O1-14 regarding analysis of incompatible land uses and new development resulting in negative health implications.
- I29-16 The comment requests an analysis of a scenario in which wells have been put on hold and the operator cannot close the wells due to lack of funds. Additionally, the comment asserts wells must be properly closed to restore functioning ecosystems to mitigate climate change impacts and insurance is needed along with bigger bonds. Refer to response to comment O1-15 and Master Response MR-4, Section MR-4.J, “Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations),” regarding the findings and conclusions of the draft EIR related to phasing out the oil and gas industry.
- I29-17 Refer to response to comment O1-16 for a discussion GHG mitigation measures.
- I29-18 The comment asserts that the failure to develop wholesale and commercial scale renewable energy generation and microgrids is a significant environmental impact, for which community microgrids is a feasible mitigation. Refer to response to comment O1-17.
- I29-19 The comment states that the failure to properly manage waste has a significant environmental impact, especially when it produces methane which is driving climate change. Refer to response to comment O1-18.
- I29-20 The comment summarizes more detailed comments provided elsewhere in the comment letter. See responses to comments O1-20 through O1-32 regarding policy recommendations for the General Plan to achieve GHG reduction goals to mitigate climate change.
- I29-21 Refer to response to comment O1-20 regarding comments submitted by Bruce Smith. Also, see responses to Letter I20 from Bruce Smith..
- I29-22 Refer to response to comment O1-21 regarding overriding considerations and evaluation of vehicle miles traveled.
- I29-23 Refer to response to comment O1-22 regarding the assertion that 2040 General Plan Policy CTM 3-9 has a significant environmental impact.

- I29-24 The comment is related to vehicle miles of travel benchmarks and public review. Refer to response to comment O1-23.
- I29-25 The comment suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-24.
- I29-26 The comment provides suggested edits to policies proposed and suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-25.
- I29-27 The comment asserts that local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. Refer to response to comment O1-26.
- I29-28 The comment suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-27.
- I29-29 Refer to Master Response MR-4, Section MR-4.H “Buffers (Setback),” Section MR-4.J “Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations),” Section MR-4.F “Flaring,” and Section MR-4.G “Pipeline Requirements” regarding the findings and conclusions related to buffers (setbacks), phasing out the oil and gas industry, flaring, and pipelines in oil and gas operations. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopted a final 2040 General Plan.
- I29-30 The comment suggests additional policies to be included in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-29.
- I29-31 The comment suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-30.
- I29-32 The comment provides suggested actions that could benefit water resources, but fails to provide evidence linking benefits from these actions to impacts from implementation of the 2040 General Plan identified in the draft EIR. Refer to response to comment O1-31.
- I29-33 The comment suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. Refer to response to comment O1-32.
- I29-34 Refer to response to comment O1-33.

**From:** Chris Tull <ctull17@gmail.com>  
**Sent:** Thursday, February 27, 2020 6:32 PM  
**To:** General Plan Update  
**Subject:** Please support a dedicated county bike network

<p><b>Letter I30</b></p>
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**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please support the Santa Clara River Loop trail and the Santa Paula Branch Line bike/ped trails to help form a bike/ped backbone throughout our county.

I30-1
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Thank you,

--  
 Christopher Tull  
 Oxnard, CA 93030

<b>Letter I30</b>	<b>Christopher Tull</b> February 27, 2020
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I30-1      The comment requesting support for a dedicated bike network in the county is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**From:** 805countrysquire@gmail.com <805countrysquire@gmail.com>  
**Sent:** Tuesday, February 25, 2020 2:35 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan Draft EIR Comment

**Letter  
I31**

VC Planning,

You may have remembered a news story in the VC Star about my wife and I defending our Tierra Rejada home from the Easy Fire in 2019. My wife and I did this, alone, without assistance of the VC Fire Dept due to the fact that they were busy protecting the Reagan Library. We know firsthand the potential destruction of wildfires. But more importantly, we understand the role of vegetation buffers and wildfire fuel control. Part of the reason my wife and I were able to stand our ground and successfully defend our home from the flames was due to the fact that we had regularly cut and disposed of vegetation FARTHER than the 100-foot barrier required by the County or that will be permitted to be done with the aid of mechanized equipment. We have been told that we were "lucky". No, we were prepared, but our ability to continue that preparation will be severely hampered with these new regulations.

I31-1

In Part 4.9 of the EIR, the County talks about how increased fuel loads will increase risk of wildfires. But then the County fails to talk about Policies COS-3.2, COS-1.15, Implementation Program COS-H, and Implementation Program COS-C which will increase fuel load and vegetation.

Please revise the DEIR so that it accurately identifies and mitigates wildfire risks. Help me save my home from the next wildfire.

Best Regards

*Chuck*

Chuck Carmichael  
 Country Squire  
 The End of the Road  
 15664 LaPeyre Road  
 Moorpark, CA 93021

Cell (818) 399-9067  
 Fax (818) 698-6435

Email: [805CountrySquire@gmail.com](mailto:805CountrySquire@gmail.com)

**Letter  
I31**

**Chuck Carmichael**  
 February 25, 2020

I31-1

The comment expresses concern about 2040 General Plan policies and programs that the commenter asserts could increase fuel loads and their potential to effect wildfire hazards. See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs and the potential to increase wildland fire hazard.



**From:** Clint Fultz <info@email.actionnetwork.org>  
**Sent:** Sunday, February 23, 2020 8:18 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** We're in a Climate Emergency!

**Letter  
I32**

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to [Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I am deeply about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

I32-1

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I32-2

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management and supporting HR763 The Energy Innovation and Carbon Dividend Act.

I32-3

We want an EIR that covers major climate impacts via a systematic plan.

Thank you—

Clint Fultz

Clint Fultz

[dibelieve@protonmail.com](mailto:dibelieve@protonmail.com)

787 St Charles Dr Apt 8

Thousand Oaks , California 91360

**Letter  
I32**

**Clint Fultz**  
February 23, 2020

This comment letter repeats many of the same comments provided in Letter I3. The responses below provide cross references to the portions of Letter I3 where responses to the same comments have already been provided.

- I32-1 Refer to response to comment I3-1 regarding the commenter's concerns about climate change and the draft EIR analysis.
- I32-2 Refer to response to comment I3-2 regarding the use of the most current climate change science in the draft EIR analysis.
- I32-3 Refer to response to comment I3-3 regarding suggested mitigation measures.

**From:** roncyndied@aol.com  
**Sent:** Thursday, February 27, 2020 4:30 PM  
**To:** General Plan Update; Curtis, Susan  
**Subject:** Ventura County General Plan

**Letter  
I33**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I33-1

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

I33-2

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I33-3

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community. I33-4
2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies. I33-5
3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant." I33-6
4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable. I33-7
5. The Plan does not adequately evaluate the impacts of increased competition for water in our community. I33-8

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input. I33-9

Sincerely,  
Cynthia Thomas Dickson  
32075 Camino del Cielo  
Trabuco Canyon, CA 92679

**Letter  
I33**

**Cynthia Thomas Dickson**  
February 27, 2020

This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- |       |  |
|-------|--|
| I33-1 | Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County. |
| I33-2 | Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.                                   |
| I33-3 | Refer to response to comment I9-4 regarding the adequacy of the draft EIR.   |
| I33-4 | Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.               |
| I33-5 | Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.                                |
| I33-6 | Refer to response to comment I9-7 regarding the adequacy of the draft EIR.   |
| I33-7 | Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.               |
| I33-8 | Refer to response to comment I9-9 regarding water supply.  |
| I33-9 | Refer to response to comment I9-10 regarding the adequacy of the draft EIR.  |

**From:** Daniel Chambers <danchambers55@gmail.com>  
**Sent:** Thursday, February 27, 2020 12:35 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Fwd: Number 3--Fwd: County General Plan/EIR Comments

Letter  
I34

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 South Victoria Avenue, L#1740  
 Ventura, CA 93009-1740  
 Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvoy

I, Daniel James Chambers, fully support the content of this letter.

I34-1

I34-2

I34-3

I34-4

<b>Letter I34</b>	<b>Daniel J Chambers</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter I8. The responses below provide cross references to the portions of Letter I8 where responses to the same comments have already been provided.

- I34-1 Refer to response to comment I8-2 regarding the history of the McLoughlin family, and the adequacy of the 2040 General Plan and draft EIR.
- I34-2 Refer to response to comment I8-3 regarding roadway expansion, addition of bike paths and lanes, and the resulting loss of farmland and impacts related to farming operations.
- I34-3 Refer to Master Response MR-2 regarding the 2040 General Plan's consistency with the Save Open Space and Agricultural Resources initiative.
- I34-4 Refer to response to comment I8-5 regarding analysis of economic issues in the draft EIR. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Dario Grossberger <dariogro@gmail.com>

**Sent:** Thursday, February 27, 2020 5:00 PM

**To:** Curtis, Susan <Susan.Curtis@ventura.org>; chris@rinconstrategies.com; llampara@colabvc.org

**Subject:** 2040 General Plan Draft EIR Comment

**Letter  
I35**

Regarding the 2040 General Plan,

The County failed to analyze the impact of allowing alternative fuel production in an Industrial area.

The County must analyze any impact that creates hazards on public health and safety through the transport, use or disposal of HazMat and HazWaste.

The County failed to evaluate Policy CTM-6.4 (alternative fueling stations) and has failed to even mention Policy LU-11.X (alternative fuel production) or Implementation Program LU-Program X (County shall allow the production of alternative fuel). These policies were not analyzed for impacts - and yet the County claims, without having conducted a complete and thorough analysis, that the impact will be less than significant (pg. 4.9-12 and 4.9-14).

This analysis was grossly inadequate and needs to be corrected and the EIR needs to be recirculated.

Sincerely yours,

Dario Grossberger

I35-1

<b>Letter I35</b>	<b>Dario Grossberger</b> February 27, 2020
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- I35-1 Refer to response to comment O32-29 regarding the analysis of policies that encourage production of alternative fuels and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Dave Chambers <davechambers911@gmail.com>  
**Sent:** Tuesday, February 25, 2020 4:53 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** County General Plan Response

Letter  
I36

Ventura County Resource Management Agency, Planning Division

Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I36-1

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

I36-2

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I36-3

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

I36-4

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.

I36-5

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."

I36-6

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.

I36-7

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

I36-8

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

I36-9

Sincerely,  
Dave Chambers

**Letter  
I36**

**Dave Chambers**  
February 25, 2020

This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- I36-1      Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County.
- I36-2      Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.
- I36-3      Refer to response to comment I9-4 regarding the adequacy of the draft EIR.
- I36-4      Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.
- I36-5      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I36-6      Refer to response to comment I9-7 regarding the adequacy of the draft EIR.
- I36-7      Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.
- I36-8      Refer to response to comment I9-9 regarding water supply.
- I36-9      Refer to response to comment I9-10 regarding the adequacy of the draft EIR.

**From:** Dave Chambers <davechambers911@gmail.com>  
**Sent:** Tuesday, February 25, 2020 5:19 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Response to General Plan/EIR Comments

Letter  
137

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 South Victoria Avenue, L#1740  
 Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure—it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors—all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvooy

I support this letter-  
 Dave Holroyd Chambers

I37-1

I37-2

I37-3

I37-4



**Letter  
I37****Dave Holroyd Chambers**  
February 25, 2020

This comment letter repeats many of the same comments provided in Letter I8. The responses below provide cross references to the portions of Letter I8 where responses to the same comments have already been provided.

- I37-1 Refer to response to comment I8-2 regarding the history of the McLoughlin family, and the adequacy of the 2040 General Plan and draft EIR.
- I37-2 Refer to response to comment I8-3 regarding roadway expansion, addition of bike paths and lanes, and the resulting loss of farmland and impacts related to farming operations.
- I37-3 Refer to response to comment I8-4 and Master Response MR-2 regarding the 2040 General Plan's consistency with the Save Open Space and Agricultural Resources initiative.
- I37-4 Refer to response to comment I8-5 regarding analysis of economic issues in the draft EIR. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Dave Chambers <davechambers911@gmail.com>**Sent:** Tuesday, February 25, 2020 5:20 PM**To:** Curtis, Susan <Susan.Curtis@ventura.org>**Subject:** General Plan/EIR Comments

To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Dave Holroyd Chambers

**Letter  
I38**

I38-1

**Letter  
I38****Dave Holroyd Chambers**  
February 25, 2020

This comment letter repeats the same comments provided in Letter I6. The responses below provide cross references to the portions of Letter I6 where responses to the same comments have already been provided.

- I38-1 Refer to response to comment I6-1, which discusses setbacks from freeways and high traffic roads as a way to reduce adverse air quality effects for sensitive receptors, and the feasibility of Mitigation Measure AQ-3 (Policy HAZ-10.X).

**From:** Dave Chambers <davechambers911@gmail.com>  
**Sent:** Thursday, February 27, 2020 7:42 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** General Plan/EIR Comments

Letter  
I39

Sanger Hedrick, Chair  
 Agricultural Policy Advisory Committee (APAC) County of Ventura  
 800 S. Victoria Blvd.  
 Ventura, CA 93003

**Re: 2040 General Plan Environmental Impact Report (EIR)**

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

I39-1

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time,

" *(emphasis added)*. All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

I39-2

February 19, 2020

Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

I39-2  
cont.

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

#### Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (emphasis added).

I39-3

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 3 of 4

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

I39-4

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

I39-5

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

I39-6

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion. But the County fails to analyze or propose mitigation measures to address this significant impact.

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

I39-7

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director

In support of this letter-

In support of this letter-

Dave Holroyd Chambers

<b>Letter I39</b>	<b>Dave Holroyd Chambers</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter A13. The responses below provide cross references to the portions of Letter A13 where responses to the same comments have already been provided.

- I39-1      The comment describes that the Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) has provided the following comments to the Agricultural Policy Advisory Committee describing issues with the draft EIR “that CoLAB believes will negatively impact the viability of local agriculture.” This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I39-2      Refer to response to comment A13-7 and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I39-3      Refer to response to comment A13-8 regarding the Right-to-Farm Ordinance and land use conflicts.
- I39-4      Refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I39-5      Refer to response to comment A13-10 regarding 2040 General Plan Policies AG-5.2 and AG-5.3.
- I39-6      Refer to response to comment A13-11 regarding water resources and loss of topsoil.
- I39-7      Refer to response to comment A13-12 regarding mitigation measure suggestions.

**From:** Dave Chambers <davechambers911@gmail.com>  
**Sent:** Tuesday, February 25, 2020 5:17 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comments re General Plan/EIR

Letter  
I40

Sanger Hedrick, Chair  
 Agricultural Policy Advisory Committee (APAC) County of Ventura  
 800 S. Victoria Blvd.  
 Ventura, CA 93003

**Re: 2040 General Plan Environmental Impact Report (EIR)**

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

I40-1

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time,

" *(emphasis added)*. All mitigation measures proposed in an EIR must be shown to reduce impacts and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

I40-2

February 19, 2020

Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor

I40-2  
cont.

Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

#### Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (*emphasis added*).

I40-3

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.



Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 3 of 4

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

I40-4

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR. But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

I40-5

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

I40-6

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion. But the County fails to analyze or propose mitigation measures to address this significant impact.

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

I40-7

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,  
Louise Lampara Executive Director

In support of this letter- Dave Holroyd Chambers

In support of this letter- Beverly Chambers de Nicola

<b>Letter I40</b>	<b>Dave Holroyd Chambers and Beverly Chambers de Nicola</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter A13. The responses below provide cross references to the portions of Letter A13 where responses to the same comments have already been provided.

- I40-1        The comment describes that the Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) has provided the following comments to the Agricultural Policy Advisory Committee describing issues with the draft EIR “that CoLAB believes will negatively impact the viability of local agriculture.” This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I40-2        Refer to response to comment A13-7 and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I40-3        Refer to response to comment A13-8 regarding the Right-to-Farm Ordinance and land use conflicts.
- I40-4        Refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I40-5        Refer to response to comment A13-10 regarding 2040 General Plan Policies AG-5.2 and AG-5.3.
- I40-6        Refer to response to comment A13-11 regarding water resources and loss of topsoil.
- I40-7        Refer to response to comment A13-12 regarding mitigation measure suggestions.

February 27, 2020

Susan Curtis, Manager  
General Plan Update Section  
Ventura County Planning Division  
800 S. Victoria Ave  
Ventura, CA 93009

VIA Email: [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Letter  
I41

Dear Ms. Curtis,

The Ventura County General Plan Update Draft Environmental Impact Report (DEIR) fails to adequately address the impacts associated with the policies proposed by the draft General Plan. Specifically, this letter comments on DEIR Section 4.2 – Agriculture and Forestry Resources.

Section 15168 (b)(2) of the California Resources Code identifies one of the advantages of a Program EIR as ensuring “consideration of cumulative impacts that might be slighted in a case-by-case analysis.” The DEIR further clarifies: “The impact analysis provided in this section addresses the physical changes to the existing environment that could occur as a result of 2040 General Plan implementation.”

The methodology of the analysis (Section 4.2.2) addresses only future development and land-use conflicts. Implementation of the General Plan is much more complex. This approach treats agricultural resources as just another land use designation while ignoring the viability of what CEQA determined to be a critical and valuable part of our environment.

I41-1

There are numerous deficiencies but for brevity I will review the first two scoring factors in the California LESA model: water availability and project size. Both are critical to the viability of sustainable agricultural production but the impacts of the proposed General Plan policies and DEIR mitigations are not properly analyzed or evaluated. The proposed policies and mitigations could result in the conversion of Farmland to non-agricultural uses or create physical changes that are not analyzed or meaningfully mitigated under the DEIR.

**Water Availability.** The DEIR passingly references the importance of water to agricultural sustainability but fails to quantify existing conditions or anticipated changes in availability for agricultural uses. The Background Report and Section 4-10 identify groundwater basins in overdraft including the Oxnard Plain Basin that provides more than half of all agricultural irrigation water in the county. The proposed GSP for the Oxnard Basin will require significant reductions in agricultural groundwater extraction over the next 20 years - possibly up to 50%. The head of the Fox Canyon GMA is advocating for the full reductions immediately.

I41-2

It is not possible to irrigate the same amount of land with half the water. The reductions in available water for irrigation and increased costs will necessarily lead to the fallowing of thousands of acres of agricultural land during the General Plan’s 20-year time horizon.

Unplanted areas will be subject to increased erosion from wind and water forces. The proposed General Plan policies will play a significant role in the conversion of current Farmland to non-agricultural uses.

The proposed mitigations of permanently restricting agricultural lands on a 2:1 basis is well established to be infeasible (see LAFCo analysis). Without water, the designated land could not be used for agricultural production. There is no analysis of any of the impacts from significant water supply reductions and the DEIR is inadequate.

I41-2  
cont.

**Project Size.** According to the DEIR, the county contains prime agricultural lands that "...are capable of supporting commercially viable agricultural operations on minimum 9-acre parcels. According to the most recent data from the USDA (2017), the majority of farms in the county are less than 50 acres and approximately half of the farms are less than 10 acres."

Despite this data, the General Plan sets a minimum lot size for Agriculture that is at least four times larger than half of the existing farms:

Policy LU-8.3: Minimal Parcel Size for the Agricultural Land Use Designation. The County shall ensure that the smallest minimum parcel size consistent with the Agricultural land use designation is 40 acres. The County may require larger minimum parcel sizes based on the zone classification.

For farms located in an Open Space land-use designation, the minimum lot size is 10 acres. These policies may make more than half of all farms nonconforming with the underlying General Plan. The probability that a nonconforming farm lot was created legally is extremely low. Over the extended life of the plan, the impacts on agricultural resources are potentially profound.

I41-3

LU 4-4 and Sec. 8113-8 of the Non-Coastal Zoning Ordinance, for example, prohibit the allowed uses on a nonconforming lot unless it is a legal lot. No building permits may be issued on an illegal lot. To correct most illegal lots requires a Conditional Certificate of Compliance and the conditions are not required to be feasible. Generally, consistency with the General Plan requires that the lot conform to the established minimum lot size. By setting the minimum lot size larger than most of the existing farms, the General Plan will require that illegal lot owners purchase adjacent land. If that land is not available or too expensive, the county may shut down the existing agricultural use and/or deny any new permits.

The General Plan sets minimum lot sizes larger than more than half of the County's farms and larger than what the County determined was necessary for commercial viability. There is no analysis of how many farms may be impacted by these policies or how they could result in the conversion to non-agricultural uses.

The conversion to non-agricultural uses under CEQA is not predicated on establishing an alternative land use designation. Any use or having no use that results in stopping the

I41-4

production of agriculture constitutes a conversion. The DEIR fails evaluate all potential impacts and must be rewritten and subsequently recirculated for review.

I41-4  
cont.

Thank you in advance for your consideration.

Respectfully,



David S. Armstrong  
P.O. Box 25010  
Ventura, CA 93002

**Letter  
I41**

**David S Armstrong**  
February 27, 2020

I41-1

The comment asserts that the draft EIR does not adequately address impacts associated with proposed 2040 General Plan policies, specifically related to agriculture and forestry resources, because the impact assessment methodology does not account for the complexity of the 2040 General Plan. The comment also introduces more detailed comments below as based on the California Agricultural Land Evaluation and Site Assessment (LESA) Model.

The LESA model is a point-based approach for rating the relative importance of agricultural land resources that was developed by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. It is based upon specific, measurable features at the parcel scale and is most appropriately applied at the project level. Refer to response to comment I41-2 and I41-3, below, for detailed response.

The draft EIR analyzes, at a programmatic level, the physical changes that could occur upon implementation of the 2040 General Plan. Contrary to the commenter's assertion, the analysis of potential agricultural impacts is not limited to evaluation of direct land use conflicts. As explained under the subheading "Methodology" on page 4.2-3:

The analysis considers whether future development under the 2040 General Plan could result in loss of agricultural resources or conversion of agricultural resources to non-agricultural uses by allowing for non-agricultural land uses to be located directly on existing designated farmland. It also considers whether the 2040 General Plan would result in indirect loss of agricultural resources by allowing for non-agricultural land uses adjacent to classified farmland. Examples of indirect losses of agricultural resources due to land use conflicts include: decreased solar access due to building heights from nonagricultural uses, dust exposure from construction or ongoing operations, and a reduction in available water resources for irrigation. Indirect loss of agricultural soils is due to increased wind and water erosion and direct loss of important soils is attributed to removal or permanent overcovering.

The discussion in the draft EIR under the subheading “Thresholds of Significance” explains the development of thresholds for the evaluation. As explained, the option to evaluate the 2040 General Plan based on the LESA model was not employed. Instead, thresholds were developed by combining the County of Ventura’s adopted Initial Study Assessment Guidelines, which include threshold criteria to assist in the evaluation of significant impacts for individual projects, and the sample questions provided in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. This has resulted in an appropriately thorough and CEQA-compliant evaluation of the potential for implementation of the 2040 General Plan to result in conversion of agricultural land.

The comment suggests that the draft EIR does not provide an analysis or meaningful mitigation of policies and mitigation measures that could result in the conversion of farmland to non-agricultural uses or create physical changes, but provides no specific examples. The draft EIR discusses the potential for direct and indirect loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance under Impact 4.2-1 beginning on page 4.2-9. Any future development that causes the loss of Important Farmland that exceeds the County’s acreage thresholds would be considered significant. Potential for conflicts between Farmland and non-agricultural uses to result in conversion or loss of agricultural land is evaluated in Impact 4.2-2 beginning on page 4.2-17 of the draft EIR. As summarized on page 4.2-18, the 2040 General Plan includes policies and programs that limit potential for land use conflicts in addition to the County’s robust existing regulatory framework established to protect agricultural resources; therefore, potential for conflicts would be minimal.

- I41-2      The comment states that the draft EIR does not quantify existing conditions or anticipated changes in water availability for agricultural uses. Refer to response to comment A13-11 for a discussion of available water resources for irrigation and indirect impacts to agricultural land. Also refer to response to comment O7-4 addressing the availability of water for the agricultural industry.

Specifically, the commenter cites the proposed groundwater sustainability plan for the Oxnard Basin and restrictions on water use purportedly proposed by Fox Canyon Groundwater Management Agency. These changes are being made by water purveyors in response to State legislation and are not part of the 2040 General Plan. A reduction in available water resources that causes conversion of farmland is not a potential impact of the project and is, therefore, appropriately excluded from the draft EIR impact discussion.

Although the comment states that the proposed 2040 General Plan policies will play a significant role in the conversion of farmland to non-agricultural uses, no specific areas of concern are identified. Refer to response to comment I41-1, above, regarding the draft EIR’s discussion of potential conversion of farmland to non-agriculture uses and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.

- I41-3      The comment states that the 2040 General Plan would create minimum lot size requirements for the Open Space and Agricultural land use designations, which it asserts would make more than half of farms in the county non-conforming with the

General Plan, and that as a result existing agricultural uses would be shut down or otherwise become non-agricultural uses. The comment further states that there is no analysis of the effect that policies establishing minimum parcel sizes could have on existing agricultural operations. Because these existing land uses would be considered non-conforming, the comment indicates that the 2040 General Plan could impair the ability for agricultural properties that do not meet the parcel size requirements to obtain building permits. The 2040 General Plan proposes no change in the minimum lot sizes of any land use designations. Therefore, the commenter's assertion that the 2040 General Plan would create new minimum lot size requirements is inaccurate. Furthermore, EIRs are not required to speculate about a project's environmental impacts (State CEQA Guidelines, § 15145). As an initial matter, the 2040 General Plan would not make or require any regulatory changes that would render any existing legal lot nonconforming as to minimum lot size. Moreover, no County land use approval is needed to engage in agricultural production regardless of the size of the parcel or its conformance to the applicable minimum lot size. In addition, there is no blanket prohibition on the issuance of building permits for structures proposed on legal lots that do not conform to the applicable minimum lot size. There is no evidence that existing agricultural uses would be "shut down" or that building permits would be denied if landowners do not purchase adjacent land to increase lot sizes to conform to the minimum lot size requirements of the 2040 General Plan. Discussion of potential indirect effects related to minimum lot sizes would be speculative and would not significantly change the analysis or conclusions of the draft EIR. No changes to the draft EIR have been made in response to this comment.

I41-4 The comment suggests that any outcome of the 2040 General Plan "that results in stopping the production of agriculture constitutes a conversion" pursuant to CEQA and asserts that the draft EIR fails to evaluate all potential impacts.

In fact, the evaluation of the effect of a project on agriculture under CEQA addresses conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as defined by the United States Department of Agriculture (see Pub. Res. Code, § 21060.1 and Section II.a of Appendix G to the State CEQA Guidelines). Changes to the existing environment are also evaluated for their potential to result in conversion of Farmland to non-agricultural use (see Section II.e of Appendix G). Therefore, the analysis in the draft EIR appropriately addresses effects to land that meets the requirements of these designations; an evaluation of all land in agricultural production is not required. Further, CEQA does not define the term "conversion" for the purpose of this evaluation. See response to comment O5-29 for additional discussion of agricultural conversion.

As discussed in response to comments I41-2 and I41-3, above, there is no evidence that the policies and implementation programs proposed in the 2040 General Plan would result in changes to the existing environment that would cause conversion of farmland to non-agricultural use beyond those analyzed in the draft EIR. The potential for specific future projects to conflict with, or cause the conversion of, agricultural land would be evaluated at the project level. As discussed on page 4.2-17 of the draft EIR, the potential to result in the conversion of Farmland is considered a significant and unavoidable impact due



to the potential that future projects could result in direct or indirect loss of Important Farmlands because there are no actions or policies that the County could feasibly mandate to fully replace the loss of Important Farmland. Refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

Ventura County Resource Management Agency, Planning Division  
Attn: Susan Curtis, Manager, General Plan Update Section  
800 South Victoria Avenue, L#1740  
Ventura, CA 93009-1740

Letter  
I42

REC'D FEB 27 2023

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I am a part of the McLoughlin Family. We have been farming in Ventura County for approximately 150 years. We currently own 300 acres of agricultural property off of Olivas Park Road in the County of Ventura near the Ventura Marina on Harbor Rd, in proximity to the City of Ventura.

The McLoughlin family has farmed this land and other parcels for generations going back to 1863. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for widening, a stretch of roadway that borders the entire eastern portion of our farmland property. While the impact on our farming operation and financial losses due to property road and loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

I42-1

I42-2

I42-3

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I42-4

I appreciate your consideration.



**Letter  
I42**

**David Czarnecki**  
February 27, 2020

This comment letter repeats many of the same comments provided in Letter I8. The responses below provide cross references to the portions of Letter I8 where responses to the same comments have already been provided.

- I42-1 Refer to response to comment I8-2 regarding the history of the McLoughlin family, and the adequacy of the 2040 General Plan and draft EIR.
- I42-2 Refer to response to comment I8-3 regarding roadway expansion, addition of bike paths and lanes, and the resulting loss of farmland and impacts related to farming operations.
- I42-3 Refer to response to comment I8-4 and Master Response MR-2 regarding the 2040 General Plan's consistency with the Save Open Space and Agricultural Resources initiative.
- I42-4 Refer to response to comment I8-5 regarding analysis of economic issues in the draft EIR. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Saturday, January 25, 2020 2:02 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I43**

**You have a NEW Comment**

**Name:**

dawn kuznkowski

**Contact Information:**

2361 Calle Malvon Thousand Oaks CA 91360

**Comment On:**

resources/open space/conservation

**Your Comment:**

I am very concerned that Ventura County is not taking drastic enough steps to protect our drinking water, and air quality from contamination from the oil industry. In a time of drought we should have a moratorium on fracking. Flaring is contaminating our air and it's avoidable and there are solutions. Sadly it's business as usual even though our air quality and water quality are continually suffering from the oil industry. We need forward thinking in our general plan to tackle climate change and really make a measurable difference. Please phase out fossil fuel production, maintain policy COS-7.8 and protect our finite water supply, and our air quality. Thank you. Dawn Kuznkowski

I43-1

<b>Letter I43</b>	<b>Dawn Kuznkowski</b> February 25, 2020
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- I43-1      Refer to Master Response MR-4, Section MR-4.A County's Authority to Regulate Oil and Gas Development, Section MR-4.F Flaring, and Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations), regarding the findings and conclusions related to the County's authority to prohibit specific activities such as hydraulic fracturing, flaring in oil and gas operations, and phasing out the oil and gas industry.

February 25, 2020

Letter  
I44

Susan Curtis, Manager, General Plan Section Update  
Ventura County Resource Management Agency, Planning Division  
800 S. Victoria Ave., L #1740  
Ventura, California 93009

via email: [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Re: General Plan Update Draft Environmental Impact Report Comments

Dear Ms. Curtis,

We are royalty owners who have lived in Ventura County for 71 years. We support continued local oil and natural gas production. Royalty and mineral rights owners have a legally vested interest in mineral rights. We have many concerns regarding the economic impact of the Draft Environmental Impact Report (DEIR).

Upon further review of the DEIR, we believe that the document has a bias against local oil and gas producers. COS-7.2 mandates a 2,500-foot setback for oil and gas wells in the unincorporated areas of the County. This arbitrary setback does little to safeguard public health and safety. It does however lead to an unavoidable shutdown of many existing oil operations. The DEIR itself states that, "There are no actions or policies that the County could feasibly mandate to fully reduce the impact that Policy COS 7.2 would have on hampering or precluding access to petroleum resources. This impact would remain significant and unavoidable". It is of concern to us that this new policy would leave the County vulnerable to millions of dollars in lawsuits if passed.

The DEIR neglects to accurately assess the financial impact of setbacks on the County. The DEIR cites Assembly Bill 345 to support the new setback policy. This is inappropriate given that AB 345 is stalled in the state legislature last year. The legislature's analysis of AB 345 estimated a loss of up to \$3.5 billion in revenue from reserves in the setback zone, and that the bill was so draconian that it would likely lead to lawsuits. It is not the policy Ventura County should be looking to model.

The City of Los Angeles Department of Public Works Office of Petroleum and Natural Gas Administration recently published a report that concluded: "The estimated potential cost to the City of establishing a setback distance on existing operations is \$724 million, which includes the minimum value of the current oil production, land value costs, well abandonment costs, environmental clean-up costs and five years of litigation expenses." Future operations subject to setback policies could be as high as \$97.6 billion in compensation for the future value of mineral rights owed from takings litigation.

I44-1

The DEIR does not consider minimum value of the current oil production, land value costs, well abandonment costs, environmental clean-up costs and five years of litigation expenses like the City of Los Angeles Department of Public Works Office of Petroleum and Natural Gas Administration report. The true cost of setbacks is missing from this DEIR.

Any effort to infringe upon legally vested rights is concerning. We believe local energy production contributes to a vibrant economy and provides an affordable reliable energy source for the state. Ventura County is lucky to have this natural resource. The DEIR should be revised and recirculated to accurately reflect oil and gas revenue as it pertains to mineral rights owners.

I44-1  
cont.

Sincerely,

*Dennis Reynolds*

Dennis Reynolds  
Royalty Owner

P.O. Box 1776  
Camarillo CA 93011

<b>Letter I44</b>	<b>Dennis Reynolds</b> February 25, 2020
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I44-1      The comment expresses concern about the economic impacts of the draft EIR and asserts that the draft EIR is biased against oil and gas producers. The comment apparently conflates the draft EIR with the 2040 General Plan. The 2040 General Plan is the genesis of Policy COS-7.2; the draft EIR evaluates the potential for the policies and programs proposed in the 2040 General Plan to hamper or preclude access to the resource (refer to Impact 4.12-3). As noted by the commenter, the draft EIR determines that the effect of the 2040 General Plan would be significant and unavoidable.

EIRs are not required to treat a project's economic or social effects as significant effects on the environment (CEQA Guidelines, § 15131). Social and economic effects need only be considered in an EIR where there is a clear link between those economic or social effects and physical environmental changes. Therefore, the commenter's concerns about the fairness and the financial implications of Policy COS-7.2 are appropriately excluded from discussion in the draft EIR. The economic issues raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

For further discussion of the setback proposed in COS-7.2, as well as draft EIR Mitigation Measure PR-1, which would reduce the minimum setback for schools from 2,500 feet to 1,500 feet, refer to Master Response MR-4. Master Response MR-4 also provides further context regarding the County's authority to regulate oil and gas development (MR-4.A), antiquated permits and takings (MR-4.B), and the underlying motives of the proposed oil and gas policies (MR-4.C).

Regarding the comment that the draft EIR should be recirculated, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Thursday, February 27, 2020 4:55 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## You have a NEW Comment

**Name:**  
Derek McLaughlin

**Contact Information:**  
760-579-1437 271 S Ventura Rd #299 Port Hueneme

**Comment On:**  
Draft Environmental Impact Report

### Your Comment:

Don't allow expansion of the port in Port Hueneme. I live about 1/3 of a mile east of it & often I & thousands of others are downwind of it. It already has far too much air pollution. At least make them have all large vessels plug into the grid upon arrival before any expansion is seriously considered or have to install excellent air pollution equipment on their exhaust, such as scrubbers like those on one of the Wallenius Wilhelmsen auto carriers.

Even without any thought of port expansion, cleaning up the port's air pollution & the ships while in port needs to be much further the list of county air pollution priorities. Many schools are downwind of the port & almost always people are downwind of it.

Quite putting so many new residential units in highly air polluted areas near freeways. Bad for the residents till we have much cleaner fleets of vehicles.

Try hard to avoid more of the coast being lined with rip-rap & seawalls. Keep the shoreline way more natural than that. Discuss-sting when you go north of the city of Ventura. So much of the coast is rip-rap instead of natural beaches, dunes, wetlands, bluffs etc.

Regarding two things from Aug. 6, 2019 Board of Supervisor hearing, session I attended: one, Supervisor Parks idea on tree planting has a lot of good points though we must consider if more greenhouse gases will be produced then the trees make up for, by the transporting of water to water them & if water trucks will be used to water many of them. I've heard &/or read the Calif. Water Project is the largest user of electricity in the state & that's just one of the 3 large aqueduct systems that bring water to So. Calif. Water trucks should be electric, hydrogen or better, otherwise will also have air pollution from them. One fellows 90 seconds comment that day addressed problem if the trees degrade the natural ecosystems of the county. I agree that's a serious concern though Parks said we should use drought tolerant trees which will help narrow the choose to natives & a few others. That's good. We could concentrate on replacing native trees where they have been removed with natives. I think eucalyptus tend to drop stuff on the ground that prevent native plants from growing plus they blow over easy & aren't native & probably bad in fires.

2nd: I agree with all of supervisor Bennett's comments on climate change he mentioned on Aug. 6th. Not to downplay all the very important other considerations of the general plan, but I strongly feel that is the most important issue the county should address in the general plan.

Try to help insure we always have the Oxnard performing arts center

I45-1

I45-2

I45-3

<b>Letter I45</b>	<b>Derek McLaughlin</b> No date
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- I45-1 The comment raises concerns about current operation and expansion of the Port of Hueneme, locating residential units near freeways, and preservation of natural shorelines. The comment does not clearly address the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Note that the effects of the 2040 General Plan on air quality are addressed in the draft EIR in Section 4.3, "Air Quality." Specifically, Impact 4.3-5 (starting on page 4.3-20) analyzes the potential impacts to sensitive receptors from locating new residential development and other sensitive uses near high traffic volume freeways and roadways and other sources of toxic air contaminants. The draft EIR proposes Mitigation Measure AQ-3, which, as revised in the final EIR, would require that new sensitive receptors not be located within 1,000 feet of any freeway or roadway experiencing traffic volumes that exceed 50,000 vehicles per day, respectively, unless a site-specific Ventura County Air Pollution Control District-approved health risk assessment shows that associated levels of cancer risk at the sensitive receptors would not exceed 10 in 1 million. Refer to final EIR Chapter 3, "Revisions to the draft EIR," for the revisions to Mitigation Measure AQ-3.
- I45-2 The comment is related to implementation of Policy COS-1.15, proposed in the 2040 General Plan, through which the County would establish a goal to plant two million trees by 2040. The comment expresses concern about the greenhouse gas emissions associated with embedded energy of water that would be used to irrigate the trees and the potential for nonnative trees to degrade natural ecosystems.
- The draft EIR analyzes, at a programmatic level, the physical changes that could occur upon implementation of the 2040 General Plan; this includes planting trees pursuant to Policy COS-1.15 which states "The County shall establish and support a countywide target for the County, cities in Ventura County, agencies, organizations, businesses, and citizens to plant two million trees throughout the county by 2040." The commenter recommends that this policy should require native and drought tolerant trees. The effects of the 2040 General Plan on natural ecosystems, greenhouse gas emissions, and air quality, are addressed in the draft EIR in Section 4.4, "Biological Resources," Section 4.8, "Greenhouse Gas Emissions," and Section 4.3, "Air Quality," respectively. The location, species, and program for establishing the trees planted pursuant to Policy COS-1.15 have not been established. Furthermore, the policy encourages the planting of trees throughout Ventura County, regardless of jurisdictional boundaries and property owner (e.g. unincorporated versus city and private versus public entity) and provides broad flexibility in the species and type of trees planted to achieve this goal. For this reason, it is not possible to provide a detailed analysis of the



potential water demand and source of water to establish the trees. Additionally, because this policy encourages a wide range of opportunities to plant up to two million trees countywide, it does not limit the species and type of trees. An EIR is not required to speculate about environmental impacts. It is anticipated that implementation of this policy would not conflict with the County's programs related to water use efficiency, promotion of renewable energy, and preservation of natural communities. Also, the GHG projections included in the 2040 General Plan and draft EIR account for GHG emissions associated with the embedded energy of future water consumption, which includes water for irrigation.

This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

- I45-3      The comment states that climate change is the most important topic addressed in the 2040 General Plan and requests that the County preserve the Oxnard Performing Arts Center. The comment addresses the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. Refer to Master Response MR-1 for a discussion of the Climate Action Plan that is incorporated into the 2040 General Plan. Climate change is also addressed in the draft EIR in Section 4.8, "Greenhouse Gas Emissions."

**From:** Diana Kubilos <kubilos.d@gmail.com>  
**Sent:** Thursday, February 27, 2020 5:03 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** VC2040 General Plan Input Re Climate Change Mitigation

Letter  
I46

Dear Ms. Susan Curtis,

As a member of the Ventura County Climate Hub, I have signed my name to the very thorough petition sent by the organization regarding the climate change mitigation- related components of the VC2040 Draft General Plan (and EIR). I also wanted to add a emphasize a few more points personally, covering some core areas regarding the urgent and vital climate change mitigation work we need to do, especially in the next decade. I46-1

Community Collaboration

Establish a Citizen Advisory Committee, to work with the Board of Supervisors (and relevant County staff), to help both give input to climate change mitigation efforts, as well as advise the County on critical community resilience- building work.

Sustainable Transport

Since the transportation sector is a core contributor to carbon emissions, we need to follow the lead of model green cities (such as Portland, Oregon), and establish cycling/walking linkages throughout core routes in our cities. I live in Ventura, and believe people here are desperate for more sustainable and healthy transport options. I46-2

Food Security

Please include edible, fire-mitigating, and indigenous trees in Supervisor Parks' 'two million trees' planting campaign.

Water Security

Please support community water resilience- building projects, such as one the Climate Hub is planning, called 'Transition Streets'

Thank you for your critical work,  
Diana Kubilos

<b>Letter I46</b>	<b>Diana Kubilos</b> February 27, 2020
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- I46-1 The commenting individual's participation in Ventura County Climate Hub is noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. Refer to the responses to Letter O1 for responses to the comments raised in the petition.
- I46-2 The comment provides suggestions about the types of programs that could be included in the 2040 General Plan. These include a citizen advisory committee to provide input about the climate change and community resilience, support for trails and sustainable transport, refinement to Policy COS-1.15 to address food security through the types of trees that would be planted, and "Transition Streets." As explained in draft EIR Table 4.8-6 (page 4.8-40) and in the text (page 4.8-44), the 2040 General Plan includes several programs that would reduce GHG emissions by reducing vehicle miles traveled and promoting trips by people walking and biking, and other options to driving alone (Programs CTM-A, and CTM-I to CTM-O). The 2040 General Plan also includes programs to reduce GHG emissions through water efficiency and conservation as explained on page 4.8-44. The 2040 General Plan also would include programs that reduce GHG emissions associated with the hauling and production of food including encouraging local consumption of locally produced food (page 4.8-33). The 2040 General Plan also includes Implementation Program COS-CC, which would establish a Climate Emergency Council to advise the Board of Supervisors on implementation of the climate action plan goals, policies, and programs of the 2040 General Plan.
- The draft EIR includes Mitigation Measure GHG-4, in which the Climate Emergency Council would develop recommended subprograms to implement the 52 GHG reduction policies of the 2040 General Plan that do not have associated implementation programs (draft EIR Table 4.8-7, page 4.8-45). Refer to final EIR Chapter 3, "Revisions to the draft EIR," for revisions to Mitigation Measure GHG-4.
- The comment does not identify how these changes to the 2040 General Plan would address environmental effects found to be significant in the draft EIR. Therefore, no further response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

FEB 27 '20 AM 9:00

Diane Diedrich  
 c/o Hoffman, Vance & Worthington  
 1000 S. Seaward Avenue  
 Ventura, CA 93001

Letter  
 I47

February 24, 2020

Ventura County Board of Supervisors  
 Attn: RMA Planning Division  
 General Plan Update  
 800 Victoria Avenue L#1740  
 Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I47-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I47-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I47-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I47-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I47-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I47-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I47-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I47-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I47-9

Sincerely,



Diane Diedrich

<b>Letter I47</b>	<b>Diane Diedrich</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I47-1          Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I47-2          Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I47-3          Refer to response to comment I4-3 regarding water availability and cost.
- I47-4          Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I47-5          Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I47-6          See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I47-7          Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I47-8          The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I47-9          Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

Dominick McCormick  
c/o Hoffman, Vance & Worthington  
1000 S. Seaward Avenue  
Ventura, CA 93001

Letter  
I48

FEB 27 '20 AM 8:59

February 24, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I48-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I48-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I48-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I48-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I48-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I48-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I48-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I48-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I48-9

Sincerely,



Dominick McCormick



<b>Letter I48</b>	<b>Dominick McCormick</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I48-1 Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I48-2 Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I48-3 Refer to response to comment I4-3 regarding water availability and cost.
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- I48-9 Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

February 25, 2020 - **via email**  
P.O. Box 5119  
Ventura, CA 93005-0119

**Letter  
149**

Ms. Susan Curtis, [susan.curtis@ventura.org](mailto:susan.curtis@ventura.org)  
Ventura County Resource Management Agency, Planning Division  
800 S. Victoria Ave., L #1740  
Ventura, CA 93009-1740

**Subject:** Comments on the Draft Environmental Impact Report for the 2040 Ventura County General Plan Update (Planning Division Case Number PL17-0141)

Dear Ms. Curtis:

My name is Donald Price and I am an environmental engineer retired from the Ventura County Air Pollution Control District. Please accept the following comments regarding the Draft Environmental Impact Report (DEIR) for the 2040 Ventura County General Plan Update.

I49-1

- 1) The frequency of Greenhouse Gas (GHG) Strategy Implementation and Monitoring reports and GHG emission inventory updates have been extended beyond agreed limits.

DEIR, January 2020, 2040 General Plan Implementation Programs, Conservation and Open Space Element (COS), Page 4.8-27:

**Implementation Program Z: Public Reporting on GHG Strategy Progress.** The County shall prepare public reports on the results of GHG Strategy implementation and monitoring and present these reports to the Board of Supervisors. The first report shall be submitted to the Board of Supervisors two years after the approval of the General Plan, after which the Board of Supervisors will determine the appropriate reporting interval. The County shall also present a more detailed progress report to the Board of Supervisors, including results of the latest GHG inventory update, every five years.

I49-2

**Implementation Program AA: GHG Inventory Updates.** The County shall update the County's GHG emissions inventory at least every five years.

The above reflects a significant change in the schedule for preparation of GHG Strategy Implementation and Monitoring reports and GHG emission inventory updates based on the last known discussion of the subject by the Board of Supervisors on August 6, 2019.

Appendix B: Climate Change, May, 2019, Table B-9, Page B-17:

**V - Public Reporting on GHG Strategy Progress**

The County shall prepare public reports on the results of GHG Strategy implementation and monitoring and present these reports to the Board of Supervisors at least annually. The County shall also present a more detailed progress report to the Board of

February 25, 2020  
Ms. Susan Curtis, VCRMA, Planning Division  
Page 2 of 5

Supervisors, including results of the latest GHG inventory update, at least every five years. *[Source: New Program]*

As noted in Program V above, GHG Strategy Implementation and Monitoring reports were scheduled annually in the Preliminary Draft General Plan Update. GHG emission inventory updates were proposed every five years. However, on August 6, 2019, Supervisor Bennett made it clear that five years between GHG emission inventory updates is not acceptable.

August 6, 2019, Board of Supervisors, Supervisor Bennett, [interpretation added]:

“In another place in the plan, we are going to have an annual update; it already says we’re going to have an annual update. It’s just not a greenhouse gas emissions inventory update. We will have an update...We will have it annually...”

“At the same time, waiting 5 years [for a GHG emission inventory update] seems like a long time. One though I had was, everybody’s going to want that first early check...At the 2 year mark, let’s have our first attempt; let’s see where we are. And then actually say it’s up to the Board to decide how often they want to do it after that. So, you don’t lock it in and say five years, and have everybody go ‘this Board’s just gonna ignore this’ because it’s every five years...”

“I think we’ve got to give everybody confidence that the first greenhouse gas emissions inventory [update] is going to happen fairly promptly, and you don’t set a five-year precedent.”

I agree with Supervisor Bennett; five years is too long to wait for a GHG emission inventory update. As I interpret his remarks, the first GHG inventory update should be done within two years of General Plan adoption, after which the Board will decide GHG inventory update frequency. At no time did the discussion involve the GHG annual implementation and monitoring report. I can find no further Board discussion or activity on this issue, so I do not know if the Board approved, modified or abandoned Supervisor Bennett’s proposal.

Nevertheless, I support GHG emission inventory updates every two years, as proposed by both Supervisor Bennett (for the initial report) and the Planning Commission.

2) The proposed Climate Action Plan (CAP) will never meet either the 2030 or 2040 GHG emission reduction targets.

As noted in Table 4.8-3 below, Ventura County GHG emission reduction targets have been calculated for the years 2020, 2030, 2040 and 2050. Also included are the GHG reductions needed to meet the targets, calculated from the baseline 2015 GHG emission levels for Ventura County. However, based on estimated emission reductions from “quantified” GHG reduction programs, neither the 2030 or 2040 targets will be met.

DEIR, January 2020, Page 4.8-40

I49-2  
cont.

I49-3

February 25, 2020

Ms. Susan Curtis, VCRMA, Planning Division

Page 3 of 5

Implementation of the quantified policies and programs in Table 4.8-5 would collectively provide reductions of 151,903 MTCO<sub>2</sub>e by 2030, an approximate 9 percent reduction from forecast 2030 levels and 30 percent of the reductions needed to meet a target of 1,113,972 MT CO<sub>2</sub>e for consistency with emissions targets identified in Policy COS-10.2 (41 percent below 2015 levels by 2030). An additional 361,250 MT [metric tons per year] CO<sub>2</sub>e of reductions would be needed to close the gap with the 2030 target.

The shortfall for 2040 is 644,032 MT CO<sub>2</sub>e per year. See table from Appendix D below.

DEIR, January, 2020, Page 4.8-7

Greenhouse Gas Emissions

**Table 4.8-3 2040 General Plan Target Reduction from 2015 Baseline Emissions Levels, 2020 to 2050**

	2020	2030	2040	2050
Target Percentage Below 2015 Baseline GHG Emission Levels	2.1%	41.3%	60.9%	80.4%
GHG Emissions Target (MT CO <sub>2</sub> e)	1,856,620	1,113,972	742,648	371,324
GHG Reductions Needed from Forecast GHG Emissions to Meet Targets (MT CO <sub>2</sub> e)	-62,649	513,153	797,982	1,162,398

Notes: the negative number for GHG reductions in 2020 means that the forecast GHG emissions for 2020 will be below the 2020 target.

Source: Ascent Environmental, 2019

**Appendix D, issued January, 2020, GHG Calculation Summary, unmarked chart on page 2**

GHG Gap Analysis (MT CO <sub>2</sub> e / YEAR)		
SECTOR	2030	2040
Building Energy Total	285,079	225,567
Transportation Total	487,058	446,355
Solid Waste Total	278,381	270,289
Water and Wastewater Total	13,148	13,148
Off Road Equipment Total	52	52
Agriculture Total	248,882	241,541
Stationary Source Total	314,526	343,679
<b>Legislatively Adjusted GHG Emissions Total</b>	<b>1,627,124</b>	<b>1,540,630</b>
<b>Target for Consistency with State Climate Policies</b>	<b>1,113,972</b>	<b>742,648</b>
<b>Reductions Needed to meet GPU Targets</b>	<b>513,153</b>	<b>797,982</b>
CTM-B	-3454	-5111
CTM-C	-47231	-78405
COS-S	-2019	-3367
COS-8.4	-59972	-20445
COS-W	-5042	-6677
COS-H	-354	-708
AG-H	-33830	-39236
<b>Quantified Reductions</b>	<b>(151,903)</b>	<b>(153,950)</b>
<b>Gap Remaining</b>	<b>361,250</b>	<b>644,032</b>

I49-3  
cont.

February 25, 2020

Ms. Susan Curtis, VCRMA, Planning Division

Page 4 of 5

“Quantified” GHG emission reductions are described in Table 4.8-5 (and the Appendix D table above). Table 4.8-6 lists CAP programs with “qualitative” GHG reduction benefits.

Table 4.8-6 provides an overview of 2040 General Plan programs that would result in additional GHG emissions reductions, and achieve additional progress toward meeting the 2030 GHG reduction target.

Forty-three (43) programs are listed in Table 4.8-6. Of these, I believe only twelve (12) may result in measurable GHG emission reductions. These are:

Program	Description	Monitoring Procedure
AG-I/J	Transition farm water pumps from diesel to electric	Count new electric pumps
COS-M	Tax Oil and Gas facilities	Track oil and gas production
COS-P	Energy Reach Codes	Track projects. Track Title 24 compliance
COS-S	All electric new residential with solar	Track projects. Track Title 24 compliance
COS-T	Energy efficiency in county owned buildings	Track projects
HAZ-Q/W	Local zero carbon energy generation	Track projects
HAZ T/U/V	Energy efficiency in new construction	Track projects. Track Title 24 compliance
PFS-A	Energy efficiency in county owned buildings	Track projects

I49-3  
cont.

In addition, Table 4.8-7 (Page 4.8-45) lists 52 GHG emission reduction policies with NO implementation program. Measurable emission reductions from these policies are unlikely.

DEIR, January 2020, Page 4.8-52

Additionally, longer term GHG reduction goals beyond 2030 established by State executive orders would necessitate additional or more stringent GHG reduction policies and programs beyond what is presented in the 2040 General Plan...Although the 2040 General Plan would not conflict with State GHG reduction targets and recommended local actions established in the 2017 Scoping Plan, and the 2040 General Plan would set future GHG emissions on a downward trajectory consistent with State reduction targets, it cannot be determined at this program level of analysis that future emissions within the county meet State 2030 and post-2030 targets for GHG reduction. Therefore, this impact would be **significant and unavoidable**.

This means that it is likely to be completely impossible for Ventura County to achieve its future GHG emission reduction goals with the proposed climate action plan. The cooperation of every agency in the county (local, state or federal) with a stake in energy efficiency, transportation, water use, and air pollution will be required to meet our GHG emission reduction goals.

February 25, 2020  
 Ms. Susan Curtis, VCRMA, Planning Division  
 Page 5 of 5

- 3) The prohibition on new natural gas infrastructure may be premature; it may be possible to distribute hydrogen for fuel cell electric vehicles through this delivery system

DEIR, January 2020, Page 4.8-46

**Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development**

To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential construction through amendments to the Ventura County Building Code. This program shall also be extended to include commercial building types such as offices, retail buildings, and hotels where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.

No one is more interested in closing down the fossil fuel industry and transitioning to 100 percent clean renewable energy than I am. However, in the future, blending hydrogen into natural gas pipeline networks (or distributing pure hydrogen through these networks) may be possible. This would enable fuel cell electric vehicle (FCEV) fueling at homes or businesses. Fuel cells produce only electricity and water and FCEVs may be an important transportation alternative in the future. Blending would eliminate the cost of building dedicated hydrogen pipelines for this purpose. There are issues with the process (like safety, material durability and integrity management, leakage, downstream extraction) that are likely to be overcome. Therefore, it may be premature to ban new natural gas pipeline infrastructure.

I49-4

For more information, see the following paper from the National Renewable Energy Laboratory:  
 "Blending Hydrogen into Natural Gas Pipeline Networks: A Review of Key Issues"  
 Authors: M. W. Melaina, O. Antonia, and M. Penev  
 NREL/TP-5600-51995, March 2013

- 4) I appreciate that a climate action plan is included in the 2020 General Plan. However, it is unlikely that this plan will prevent serious sea level rise, increased heat, increased fire, and water shortages in Ventura County between now and 2100. The IPCC clearly warn that we have only a few years to make a transition away from fossil fuel use if we are to have any chance of avoiding devastating climate impacts. Transitioning to clean renewable energy is essential.

I49-5

Thank you for your consideration.

Signed,



Donald R. Price ([drp@cefogg.com](mailto:drp@cefogg.com))

c: Clerk of the Board, [clerkoftheboard@ventura.org](mailto:clerkoftheboard@ventura.org)  
[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

<b>Letter I49</b>	<b>Donald Price</b> February 25, 2020
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- I49-1 The description of the commenting individual's role as an environmental engineer is noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I49-2 The comment states that the frequency of greenhouse gas (GHG) strategy implementation and monitoring reports and GHG emission inventory updates have been extended beyond agreed limits associated with Implementation Program Z and Implementation Program AA in the Conservation and Open Space Element of the 2040 General Plan. While these policies are included in Section 4.8, "Greenhouse Gas Emissions," of the draft EIR, the comment addresses policies and implementation programs of the 2040 General Plan and is not related to the adequacy of the draft EIR.
- Program Z and Program AA both support implementation and monitoring of the GHG reduction strategy (refer to Table 4.8-8 in the draft EIR). Program Z supports public participation by establishing a process for communication and public feedback on strategies. Program AA would require updates to the GHG emissions inventory to track GHG reduction performance at 5-year intervals. The comment provides no evidence that requiring update of the inventory at 2-year intervals would result in improved management and reduction of GHG emissions. There would be no change to the analysis or conclusions in the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I49-3 The comment addresses the GHG inventory prepared for baseline levels (2015) and future target years (2020, 2030, 2040, and 2050). The comment notes that the County may not achieve State targets and calls attention to the draft EIR's significant and unavoidable conclusion for Impact 4.8-2 (Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs). The draft EIR GHG analysis demonstrates that the 2040 General Plan would set future GHG emissions on a downward trajectory consistent with State reduction targets, provides detailed discussion of the 118 policies and 45 implementation programs of the 2040 General Plan that are supportive of future GHG reductions, and provides detailed discussion of why the County cannot determine at this time that future GHG emissions would align with State 2030 and post-2030 targets for GHG reduction. Refer to Master Response MR-1 for a discussion of these targets and additional details pertaining to the methodology used to estimate GHG emissions for these years.
- I49-4 The comment suggests that the implementation of Mitigation Measure GHG-1 may be premature because it may be possible in the future to use natural gas pipelines to distribute hydrogen for fuel cell electric vehicles, if fuel cell electric vehicles become widely available, although, as the commenter acknowledges, there are several issues with the feasibility of such a proposal. Decarbonization

of future residential and commercial buildings through prohibition of natural gas infrastructure under Mitigation Measure GHG-1 is consistent with the trajectory of Part 6 of Title 24 of the California Building Code (California Energy Code). The draft EIR identifies Mitigation Measure GHG-1 to reduce the potentially significant GHG emissions impacts of the 2040 General Plan (Impact 4.8-1 and Impact 4.8-2). Refer to final EIR Chapter 3, "Revisions to the draft EIR," for revisions to Mitigation Measure GHG-4. No further response to this comment is required.

I49-5

This comment expresses appreciation that climate change is addressed in the 2040 General Plan, and notes that the 2040 General Plan will not on its own prevent anticipated impacts of global climate change from affecting the county, and refers to the need for worldwide transition away from fossil fuel use to renewable energy to avoid climate change impacts. This comment does not address the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.



Dulanie Ellis-La Barre  
206 So. Blanche St., Ojai, CA 93023

REC'D FEB 06 2020

February 3, 2020

Letter  
150

RMA Planning Division, General Plan Update  
800 So. Victoria Ave., L#1740  
Ventura, CA 93009-1740

According to a recent study of data by the Washington Post, with an average temperature increase of 2.6 degrees Celsius since preindustrial times, **Ventura ranks as the fastest-warming county in the Lower 48 states.** The effects of climate change have impacted Ventura County profoundly — from the wildfires which have raged out of control to coastal infrastructure now threatened by sea-level rise.

We need to do better ... faster! Years of committee meetings must translate into action now. **The Climate Action Plan (CAP) is seriously incomplete** and lacks the technical and scientific input needed for a meaningful CAP. We are calling for a sense of urgency and an "all-hands-on-deck" effort to get it right. The county should contract immediately with a team like those employed by the city and county of Los Angeles in order to produce a robust plan capable of meeting the greenhouse Gas (GHG) emission reduction goals. At the same time, we must strengthen individual policies in the General Plan.

I50-1

Climate change is caused by fossil fuel production and consumption. **Ventura County is the third largest oil and gas-producing county in California.** As such, we must do our part to reduce oil production through thoughtful, rigorous policy to phase out production.

This CAP will set the policies that will drive land use decisions and projects that affecting GHG emissions for the next 20 years. The planet depends on each county, municipality and country to do this right.

**Climate Action Plan policies must result in measurable, enforceable reductions** sufficient to meet California's climate goals. We've had enough of vague, inspirational slogans like "encouraging" or "supporting" green policies, but little to no actions on the ground.

A recent NASA study documents that several Ventura County facilities, including **oil and gas operations, are "super-emitters" of powerful climate pollutants.** Stationary source emissions, including those from oil and gas operations, make up approximately 26 percent of all emissions in California. The time for rubber-stamping oil and gas projects needs to end. We need to phase out these "super-emitters" fossil fuel operations in Ventura County. We have plenty of sun and wind to build energy grids upon, creating new green jobs.

I50-2

**The Ojai Valley**, where I live, is known for airflow patterns that lock in airborne pollutants during the day, trapped in the Valley. The 2040 General Plan must strongly **defend the 5-pound air emissions limit for the Ojai Valley.** And buffers between oil and gas facilities and residential and schools should be increased from 1,500 to 2,500'.

I50-3

I50-4

805-640-1133 Fax: 805-640-7899 Cell: 805-798-0158  
dulanie@sbcglobal.net

Dulanie Ellis-La Barre  
206 So. Blanche St., Ojai, CA 93023

**Flaring** is another, frankly, insane practice in today's climate change crisis. It should be allowed only in case of emergencies or testing purposes. The new General Plan MUST **maintain Policy COS-7.8**, as recommended by the Board of Supervisors, so that wells are required to collect gases and use or remove them. The complaint about addressing this being "too costly" from the fossil fuel industry has always, and will always, be their excuse and failure to help right this self-caused crisis. ***Frankly, Ventura County should immediately begin phasing out all fossil fuel development and production, given that we are the fastest warming county in the entire country!***

150-5

**Fracking must be abandoned in Ventura County** - if for no other reasons than FRACKING REQUIRES ENORMOUS USE OF WATER and contaminates aquifers. The droughts are only going to get worse, we cannot afford to destroy our water sources because of fracking - not to mention the role fracking plays in prompting earthquakes. We have enough to worry about without encouraging more earthquakes in Southern California.

150-6

Ventura County, for all its beauty and fertility of land and sea, has been in bed with the oil and gas industry, in the drilling and agricultural pesticides, for far too long and at great cost to our home environment and the future of life as we know it in Ventura County.

For example:

- A 2-day 'heat bomb' last year wiped out the avocado and citrus harvests in Ojai
- Rivers are drying up: Ventura has been over-drafting their water supply from the Ventura River at Foster Park for years and is blaming Ojai (who cut their water use by 40%)
- With sea level rise, we can expect saltwater intrusion (already a problem) to inundate the Oxnard Plain and devastate food production.
- Oxnard and Ventura coastal residential areas and harbors will be flooded.
- The Navy base is already trying to prepare for sea rise and impact to military abilities
- Wildfire storms will continue to devastate wild lands and our communities

150-7

Climate change is no longer theory. Our General Plan must be a robust response. We must implement rigorous, measurable, immediate steps in our General Plan if we are to the very real challenges we face.

With great expectation that you will respond favorably, we remain,  
Sincerely yours,

Dulanie & Douglas La Barre



805-640-1133 Fax: 805-640-7899 Cell: 805-798-0158  
dulanie@sbcglobal.net

<b>Letter I50</b>	<b>Dulaine and Douglas La Barre</b> February 3, 2020
I50-1	For comments related to greenhouse gas (GHG) reduction planning concerns, refer to Master Response MR-1. For concerns regarding oil and gas, refer to Master Response MR-4.
I50-2	The comment refers to some oil and gas operations in the county as “super-emitters.” Refer to Master Response MR-1 regarding oil and gas operations and how these activities are addressed in the GHG inventories prepared for the 2040 General Plan and draft EIR.
I50-3	The comment requests that the 2040 General Plan “defend” the 5-pound air pollution limits for Ojai Valley. As discussed in the draft EIR and explained further in response to comment O20-14, the comment refers to a threshold of significance for daily reactive organic gas and nitrogen oxide emissions in the Ojai Valley which is referenced in the Ojai Valley Area Plan. This threshold, which applies to sources that are not permitted by the Ventura County Air Pollution Control District, was added to the Ventura County Air Pollution Control District’s Air Quality Assessment Guidelines in 1989 and the reference to this threshold was thereafter added to the Ojai Valley Area Plan in 1995. The 2040 General Plan would not change this threshold. The comment addresses the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
I50-4	Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.
I50-5	Refer to Master Response MR-4, Section MR-4.F Flaring and Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations), regarding the findings and conclusions related to flaring and phasing out the oil and gas industry.
I50-6	Refer to Master Response MR-4, Section MR-4.A, County’s Authority to Regulate Oil and Gas Development, regarding the County’s authority to prohibit specific activities such as hydraulic fracturing.
I50-7	The climate change impacts summarized in the comment are noted. The comment addresses the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**From:** Edward Chambers <echambers41@gmail.com>  
**Sent:** Tuesday, February 25, 2020 9:44 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Comments on County General Plan/EIR

Letter  
I51

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I51-1

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

I51-2

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I51-3

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

I51-4

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies. I51-5
3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant." I51-6
4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable. I51-7
5. The Plan does not adequately evaluate the impacts of increased competition for water in our community. I51-8
- The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input. I51-9

Sincerely,  
Edward Chambers, MD

<b>Letter I51</b>	<b>Edward Chambers, MD</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- I51-1 Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County.
- I51-2 Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.
- I51-3 Refer to response to comment I9-4 regarding the adequacy of the draft EIR.
- I51-4 Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.
- I51-5 Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I51-6 Refer to response to comment I9-7 regarding the adequacy of the draft EIR.
- I51-7 Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.
- I51-8 Refer to response to comment I9-9 regarding water supply.
- I51-9 Refer to response to comment I9-10 regarding the adequacy of the draft EIR.

**From:** Margaret McMonigle <mmmcmonigle@sbcglobal.net>  
**Sent:** Thursday, February 27, 2020 10:34 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Cc:** Don and Beverly Denicola <de.nicola@cox.net>  
**Subject:** Comments on General Plan/EIR

Letter  
I52

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My wife's great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

I52-1

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, "unlike the Preble area, services are not readily available to the Olivas lands." This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is "not included in the City's sanitation district because of problems with water pressure." This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district's pipelines actually traverse our property.

I52-2

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I52-3

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community. I52-4

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies. I52-5

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant." I52-6

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable. I52-7

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community. I52-8

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input. I52-9

Sincerely,  
Edward Michael McMonigle

<b>Letter I52</b>	<b>Edward Michael McMonigle</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

I52-1	Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County.
I52-2	Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.
I52-3	Refer to response to comment I9-4 regarding the adequacy of the draft EIR.
I52-4	Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.
I52-5	Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
I52-6	Refer to response to comment I9-7 regarding the adequacy of the draft EIR.
I52-7	Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.
I52-8	Refer to response to comment I9-9 regarding water supply.
I52-9	Refer to response to comment I9-10 regarding the adequacy of the draft EIR.

**From:** Lizzy Martinez <emchambers@aol.com>  
**Sent:** Tuesday, February 25, 2020 2:57 PM  
**To:** General Plan Update  
**Subject:** 2040 General Plan Draft EIR Comment McLoughlin Property - aka Olivas Lands

**Letter  
153**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 S. Victoria Ave., L #1740  
 Ventura, CA 93009-1740

[GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

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I53-1

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I53-2

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.



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I53-2  
cont.

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I53-3

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3. The EIR does not adequately address the enormous “indirect impacts” that will occur as a result of implementing the General Plan, calling them “less than significant.”
4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.
5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

I53-4

I53-5

I53-6

I53-7

I53-8

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

I53-9

Sincerely,  
Elizabeth Chambers Martinez and Family  
Great Granddaughter of Mark McLoughlin

<b>Letter I53</b>	<b>Elizabeth Chambers Martinez</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- I53-1      Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County.
- I53-2      Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.
- I53-3      Refer to response to comment I9-4 regarding the adequacy of the draft EIR.
- I53-4      Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.
- I53-5      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I53-6      Refer to response to comment I9-7 regarding the adequacy of the draft EIR.
- I53-7      Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.
- I53-8      Refer to response to comment I9-9 regarding water supply.
- I53-9      Refer to response to comment I9-10 regarding the adequacy of the draft EIR.

**From:** Lizzy Martinez <emchambers@aol.com>  
**Sent:** Thursday, February 27, 2020 4:20 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Cc:** General Plan Update <GeneralPlanUpdate@ventura.org>  
**Subject:** 2040 General Plan Comments

Letter  
I54

Sanger Hedrick, Chair  
 Agricultural Policy Advisory Committee (APAC) County of Ventura  
 800 S. Victoria Blvd.  
 Ventura, CA 93003

**Re: 2040 General Plan Environmental Impact Report (EIR)**

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

I54-1

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time,

" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

I54-2

February 19, 2020

Ventura County Coalition of Labor, Agriculture and Business / [1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / info@colabvc.org](mailto:info@colabvc.org)

Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

I54-2  
cont.

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

#### Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

I54-3

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (emphasis added).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

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Page 3 of 4

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

I54-3  
cont.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR. But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

I54-4

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

I54-5

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.

But the County fails to analyze or propose mitigation measures to address this significant impact.

Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / [info@colabvc.org](mailto:info@colabvc.org)

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

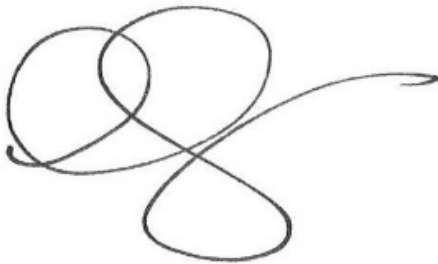
1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

I54-6

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director



In support of this letter-  
Elizabeth Chambers Martinez

Sent from my iPhone

<b>Letter I54</b>	<b>Elizabeth Chambers Martinez</b> February 27, 2020
-----------------------	---

This comment letter repeats many of the same comments provided in Letter A13. The responses below provide cross references to the portions of Letter A13 where responses to the same comments have already been provided.

- I54-1      The comment describes that the Ventura County Coalition of Labor, Agriculture, and Business (CoLAB) has provided the following comments to the Agricultural Policy Advisory Committee describing issues with the draft EIR “that CoLAB believes will negatively impact the viability of local agriculture.” This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I54-2      Refer to response to comment A13-7 and Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I54-3      Refer to response to comment A13-8 regarding the Right-to-Farm Ordinance and land use conflicts.
- Also, refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I54-4      Refer to response to comment A13-10 regarding 2040 General Plan Policies AG-5.2 and AG-5.3.
- I54-5      Refer to response to comment A13-11 regarding water resources and loss of topsoil.
- I54-6      Refer to response to comment A13-12 regarding mitigation measure suggestions.

**From:** Lizzy Martinez <emchambers@aol.com>  
**Sent:** Thursday, February 27, 2020 4:25 PM  
**To:** Curtis, Susan  
**Cc:** General Plan Update  
**Subject:** 2040 General Plan Comments

**Letter  
155**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ventura County Resource Management Agency, Planning Division  
 Attn: Susan Curtis, Manager, General Plan Update Section  
 800 South Victoria Avenue, L#1740  
 Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no “substantive” change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvoy

1

I support this letter-

Elizabeth Chambers Martinez

I55-1

I55-2

I55-3

I55-4



<b>Letter I55</b>	<b>Elizabeth Chambers Martinez</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter I8. The responses below provide cross references to the portions of Letter I8 where responses to the same comments have already been provided.

- I55-1      Refer to response to comment I8-2 regarding the history of the McLoughlin family, and the adequacy of the 2040 General Plan and draft EIR.
- I55-2      Refer to response to comment I8-3 regarding roadway expansion, addition of bike paths and lanes, and the resulting loss of farmland and impacts related to farming operations.
- I55-3      Refer to response to comment I8-4 and Master Response MR-2 regarding the 2040 General Plan's consistency with the Save Open Space and Agricultural Resources initiative.
- I55-4      Refer to response to comment I8-5 regarding analysis of economic issues in the draft EIR. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Elizabeth S <esiboldi@gmail.com>  
**Sent:** Wednesday, February 26, 2020 10:17 PM  
**To:** General Plan Update; Curtis, Susan  
**Subject:** General Plan Comments  
**Attachments:** CC - VenCo GP Update.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Letter  
I56

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to  
Spam.Manager@ventura.org

February 26, 2020

Ventura County Resource Management Agency, Planning Division ATTN Susan Curtis,  
Manager, General Plan Update Section  
800 South Victoria Avenue, L #1740  
Ventura, California 93009-1740

County of Ventura Draft Programmatic Environmental Impact Report for the draft 2040  
General Plan Update

Dear Ms. Curtis,

The County of Ventura (County) is in a unique position to be updating the County's primary planning document through 2040 as the impacts of climate change are becoming more severe. The Draft Environmental Impact Report (DEIR) fails to recognize the true impacts of climate change already occurring. The County is already experiencing a 2°C increase in average temperature from historical records. We are soon to re-enter drought conditions following the driest February on record. We are still recovering from two of the state's largest wildfires in modern history. We must act now, and we must act boldly.

I56-1

The DEIR fails to provide enough emissions reduction to meet, or meaningfully contribute to, the California state mandated climate goals. The DEIR fails to include a Climate Action Plan with measurable targets and goals to ensure County stakeholders are informed about progress, achievements and accurate analysis of shortcomings. Language used in the [plan] such as "encourage" or "support" rather than "require" or "mandate" is insufficient and meaningless to meet acknowledged greenhouse gas reduction targets.

The DEIR is based on a wholly inadequate inventory of county emissions. The inventory was conducted from top down rather than bottom up and fails to include, or even consider, a significant portion of present emissions. Recent published studies indicate significant under-assessment of greenhouse gases, especially methane, from current fossil fuel extraction and production that must be included in the DEIR analysis.

I56-2

Because the County is one of the leading producers of fossil fuels in the state, and therefore in the nation, including fossil fuel facilities NASA documents as greenhouse gas “super emitters,” the County must act now, and act boldly. Approval of the proposed DEIR would be a failure of the County’s moral and fiduciary responsibility.

Therefore, to act responsibly, the County must:

- 1) Declare a climate emergency and direct all County government offices to incorporate climate change mitigation, to the extent feasible, in all activities,
- 2) Create a Climate Action Plan 2020-2040 with measurable targets and outcomes as a separate document from the General Plan update,
- 3) Set clear climate action goals and mandate enforceable climate policies based on the declaration of a climate emergency and Climate Action Plan 2020-2040, and
- 4) As part of the Climate Action Plan 2020-2040, set five-year interval targets beginning with 2025 to immediately begin the reduction of the County’s contribution to the climate emergency.

a. Initial five-year (2025) emergency climate goals:

- i. Begin the elimination of fossil fuel extraction and production with the County by immediately prohibiting operation of fossil fuel facilities within one-mile buffer zones of schools, public parks, mobile home parks, medical facilities, or any residential zones,
- ii. Wind down discretionary oil and gas production by 10% per year to zero production in the County by 2030 starting with fossil fuel facilities within above one-mile buffer zones,
- iii. Prohibit flaring and venting from any fossil fuel infrastructure before 2025,
- iv. Implement a policy to coordinate with the California Department of Transportation (Caltrans) and the Ventura County Transportation Commission (VCTC) to cease all freeway, highway and road infrastructure expansion projects by 2025,
- v. Implement a policy to coordinate with Caltrans and VCTC to use the existing 101 Freeway and Highway 126 corridors to build light rail for inter-city and inter-county commuting by 2040,
- vi. Implement a policy to expand existing rail infrastructure for multi-track capacity by 2040,
- vii. Implement a policy to coordinate with contracted refuse companies to divert all pre- and post-consumer food waste into the “green waste” stream for composting all County-derived food waste by 2025,
- viii. Implement an agricultural policy requiring a transition to 100% regenerative farming including carbon sequestration and soil nutrient management plans by 2030,
- ix. Transition all small gas engines used in agriculture to electric models or diesel engines running on biodiesel produced from as locally-sourced waste vegetable oil as possible by 2030,
- x. Implement a policy to transition all small, non-farm gas engines (i.e. blowers, mowers, trimmers, etc.) to electric models by 2025,
- xi. Implement a policy requiring all public transportation (buses, shuttles, and all County vehicles) to be fully electric vehicles by 2030,

I56-3

I56-4

- |  |   |                |
|--|---|----------------|
| <ul style="list-style-type: none"> <li>xii. Implement a County policy to prioritize walking and bicycling by connecting communities outside incorporated city limits with adequate sidewalks, bike lanes, and/or buffers from vehicle traffic,</li> <li>xiii. Implement policies to facilitate distributed renewable energy generation and storage,</li> <li>xiv. Study the potential to repurpose existing gas infrastructure as conduit for undergrounding electrical and communication lines,</li> <li>xv. Study the potential of public banking to finance County divestment from fossil fuels and investment in sustainable energy systems, and</li> <li>xvi. Implement a policy to work with existing fossil fuel industry workers to transition into clean energy jobs supporting clean energy infrastructure in the County.</li> </ul> | <div style="display: inline-block; width: 1px; height: 100px; border-left: 1px solid black;"></div> | I56-4<br>cont. |
|--|---|----------------|

<p>Whatever price tag you want to envision for these proposals, it pales in comparison to the pending costs of sea level rise, soil degradation and crop failure, increased asthma and other heat-exasperated medical conditions, and the shortsighted failures of free market economics and laissez faire County governance to deal with climate change. To delay action, to delay investment, will only cause greater harm and increased costs for us all.</p>	<div style="display: inline-block; width: 1px; height: 50px; border-left: 1px solid black;"></div>	I56-5
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Respectfully,

Elizabeth Siboldi  
553 N Ventura Ave Apt E Ventura, CA 93001

February 26, 2020

Ventura County Resource Management Agency, Planning Division  
ATTN Susan Curtis, Manager, General Plan Update Section  
800 South Victoria Avenue, L #1740  
Ventura, California 93009-1740

County of Ventura Draft Programmatic Environmental Impact Report for the draft 2040  
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The DEIR fails to provide enough emissions reduction to meet, or meaningfully contribute to, the California state mandated climate goals. The DEIR fails to include a Climate Action Plan with measurable targets and goals to ensure County stakeholders are informed about progress, achievements and accurate analysis of shortcomings. Language used in the [plan] such as "encourage" or "support" rather than "require" or "mandate" is insufficient and meaningless to meet acknowledged greenhouse gas reduction targets.

The DEIR is based on a wholly inadequate inventory of county emissions. The inventory was conducted from top down rather than bottom up and fails to include, or even consider, a significant portion of present emissions. Recent published studies indicate significant under-assessment of greenhouse gases, especially methane, from current fossil fuel extraction and production that must be included in the DEIR analysis.

Because the County is one of the leading producers of fossil fuels in the state, and therefore in the nation, including fossil fuel facilities NASA documents as greenhouse gas "super emitters," the County must act now, and act boldly. Approval of the proposed DEIR would be a failure of the County's moral and fiduciary responsibility.

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- 2) Create a Climate Action Plan 2020-2040 with measurable targets and outcomes as a separate document from the General Plan update,
- 3) Set clear climate action goals and mandate enforceable climate policies based on the declaration of a climate emergency and Climate Action Plan 2020-2040, and
- 4) As part of the Climate Action Plan 2020-2040, set five-year interval targets beginning with 2025 to immediately begin the reduction of the County's contribution to the climate emergency.
  - a. Initial five-year (2025) emergency climate goals:
    - i. Begin the elimination of fossil fuel extraction and production with the County by immediately prohibiting operation of fossil fuel facilities within one-mile buffer zones of schools, public parks, mobile home parks, medical facilities, or any residential zones,
    - ii. Wind down discretionary oil and gas production by 10% per year to zero production in the County by 2030 starting with fossil fuel facilities within above one-mile buffer zones,
    - iii. Prohibit flaring and venting from any fossil fuel infrastructure before 2025,
    - iv. Implement a policy to coordinate with the California Department of Transportation (Caltrans) and the Ventura County Transportation Commission (VCTC) to cease all freeway, highway and road infrastructure expansion projects by 2025,
    - v. Implement a policy to coordinate with Caltrans and VCTC to use the existing 101 Freeway and Highway 126 corridors to build light rail for inter-city and inter-county commuting by 2040,
    - vi. Implement a policy to expand existing rail infrastructure for multi-track capacity by 2040,
    - vii. Implement a policy to coordinate with contracted refuse companies to divert all pre- and post-consumer food waste into the "green waste" stream for composting all County-derived food waste by 2025,
    - viii. Implement an agricultural policy requiring a transition to 100% regenerative farming including carbon sequestration and soil nutrient management plans by 2030,

- ix. Transition all small gas engines used in agriculture to electric models or diesel engines running on biodiesel produced from as locally-sourced waste vegetable oil as possible by 2030,
- x. Implement a policy to transition all small, non-farm gas engines (i.e. blowers, mowers, trimmers, etc.) to electric models by 2025,
- xi. Implement a policy requiring all public transportation (buses, shuttles, and all County vehicles) to be fully electric vehicles by 2030,
- xii. Implement a County policy to prioritize walking and bicycling by connecting communities outside incorporated city limits with adequate sidewalks, bike lanes, and/or buffers from vehicle traffic,
- xiii. Implement policies to facilitate distributed renewable energy generation and storage,
- xiv. Study the potential to repurpose existing gas infrastructure as conduit for undergrounding electrical and communication lines,
- xv. Study the potential of public banking to finance County divestment from fossil fuels and investment in sustainable energy systems, and
- xvi. Implement a policy to work with existing fossil fuel industry workers to transition into clean energy jobs supporting clean energy infrastructure in the County.

Whatever price tag you want to envision for these proposals, it pales in comparison to the pending costs of sea level rise, soil degradation and crop failure, increased asthma and other heat-exasperated medical conditions, and the shortsighted failures of free market economics and laissez faire County governance to deal with climate change. To delay action, to delay investment, will only cause greater harm and increased costs for us all.

Respectfully,

Elizabeth Siboldi  
553 N Ventura Ave Apt E  
Ventura, CA 93001

<b>Letter I56</b>	<b>Elizabeth Siboldi</b> February 26, 2020
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This comment letter repeats many of the same comments provided in Letter I23. The responses below provide cross references to the portions of Letter I23 where responses to the same comments have already been provided.

- I56-1      Refer to response to comment I23-1 regarding the effects of climate change on Ventura County.
- I56-2      Refer to response to comment I23-2 regarding the GHG inventory conducted for the County.
- I56-3      Refer to response to comment I23-3 regarding the climate action planning incorporated in the 2040 General Plan.
- I56-4      Refer to response to comment I23-4 regarding suggestions for the County to set 5-year interval reduction goals and strategies to reduce emissions.
- I56-5      The information summarizing the economic costs of the proposed 2040 General Plan are noted. This comment is a concluding statement and does not raise a significant environmental issue for which a response is required.



**From:** Emily Hirsch <emilyreneehirsch@gmail.com>  
**Sent:** Sunday, February 23, 2020 8:00 AM  
**To:** General Plan Update  
**Subject:** General Plan 2040

**Letter  
I57**

To Whom It May Concern,

The effects of climate change are overwhelmingly evident in our county. The General Plan update does not provide high enough emissions reduction to meet the state-mandated goals. A stronger plan, with the help of technical and scientific input, needs to be included for the 2040 General Plan, including a strong defense of the five pound air emissions limit for the Ojai Valley.

I57-1

Thank you,  
 Emily  
 Ojai, CA

**Letter  
I57**

**Emily Hirsch**  
 February 23, 2020

I57-1

The comment refers to the level of greenhouse gas emissions reductions provided by the 2040 General Plan relative to State goals. Refer to Master Response MR-1 for discussion of these topics. See also response to comment I50-3 regarding the Ventura County Air Pollution Control District's recommended threshold of significance for reactive organic gas and nitrogen oxide emissions in Ojai Valley.

The comment addresses the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**Letter  
158**

While I appreciate the inclusion of environmental justice as a cross-cutting issue that is addressed throughout the various sections of the Plan, I see opportunities in nearly every written goal/objective to make social justice, environmental justice, and inclusivity a stronger focus. I've only examined Section 10 due to personal time constraints, but would likely have many comments on other sections if there are public comment periods in the future.

Within Section 10 on Economic Vitality, I suggest the following edits:

- EV-1.2 should read "The County shall prioritize investment in infrastructure, services, safety net programs and other assets that are critical to future economic vitality, including public safety, healthcare, library services, water supply and quality, transportation, energy, and environmental resources. This investment shall improve equity in investment opportunities to designated disadvantaged communities, including designated Opportunity Zones under the federal Tax Cuts and Jobs Act of 2017. The focus of these efforts shall be to improve social equity and opportunity for all. (FB, SO) [Source: VCEVSP Policy A.3, E. 1, modified]"
- EV-1.3 should read: "The County shall continue to work with cities and community organizations to implement, assess, and improve best practices, pursue funding to improve housing affordability, and implement programs that a) reduce the cost of housing in order to retain and attract employers, employees, and young graduates and professionals, b) improve the number of affordable housing units accessible to the most vulnerable/disadvantaged communities, and c) meaningfully address the underlying causes of unaffordable housing in Ventura County. (MPSP, IGC) [Source: VCEVSP Policy F.1, modified]"
- EV-1.4 should read: "The County shall promote socioeconomic inclusivity and business-friendliness in the regulatory and permitting environment throughout Ventura County through collaboration (especially with existing local organizations that serve vulnerable/disadvantaged groups), exchange of ideas and best practices, improvement in clarity and efficiency in the permitting process, taking advantage of opportunities for streamlining in the development process, promoting cooperative and nonprofit business models and supporting their growth in Ventura County, and improving consistency in policy and practice among cities and the County. (RDR, IGC) [Source: VCEVSP Policy F.3, modified]"
- EV-1.6 should read: "The County shall work with local chambers of commerce, countywide economic development organizations, and businesses to support the appropriate and socially inclusive expansion of the local economy that improves the standard of living for the most vulnerable/disadvantaged communities in Ventura County first and foremost and also leads to the creation of environmentally sustainable and cutting-edge jobs for long-term economic prosperity, particularly in Existing Communities and unincorporated Urban Areas where zoning allows. (MPSP, JP) [Source: New Policy]"
- EV-1.7 should read: "The County shall strive to attract industries based on existing and projected workforce demographics, educational attainment, skills, and commute patterns, and which provide opportunities to residents living in designated disadvantaged communities. The County shall equip designated disadvantaged communities with the educational attainment, skills, and commute patterns that allow them to be highly competitive in the industries that develop in Ventura County in the future. (MPSP, JP) [Source: New Policy]"
- EV-1.8 should read: "The County shall coordinate and work with cities in the county to enhance the efficiency of development of remaining vacant commercial and industrial sites and encourage infill and revitalization of underutilized sites so that nearby neighborhoods become more walkable, green, cohesive, and affordable. (MPSP, IGC) [Source: VCEVSP A5]"
- EV-1.9 should read: "The County shall facilitate the development of a range of commercial uses in urban areas and Existing Communities, where zoning allows, that not only fulfill the daily needs of residents and visitors but also make the communities more walkable, cohesive, affordable, and vibrant. (MPSP, JP) [Source: Existing GPP Goal 3.4.1.1, modified]"
- EV-1.10 should read: "The County shall strive to attract and retain high-quality, full-service, affordable, and culturally appropriate grocery stores and other healthy food purveyors to fill local

158-1

needs in Existing Communities and adjacent urban areas, particularly in underserved areas. (MPSP, JP) [Source: *New Policy*]"

- EV-3.2 **should read:** "The County should promote and expand existing small business and women-owned business development programs by identifying partnerships between industry and educational organizations, and identifying potential mentoring, job training, networking, and professional development opportunities between these organizations and by supporting and promoting efforts of the Small Business Administration to provide technical assistance to small business owners and employees through classes and assistance in the areas of business management, marketing, and legal assistance. The County should allow entrepreneurs to use government property or facilities to test new products and services that are beneficial to the public good for micro enterprises of five employees or fewer to encourage economic and social opportunities in low-income areas. (IGC, JP) [Source: *New Policy*]"
- EV-3.5 **should read:** "The County shall support local efforts to attract firms in key industries from outside the county that have a history of positive social, environmental, and economic charity. The County shall facilitate the entrepreneurial development of new firms and cooperative business models within the county as well as support the necessary training to develop entrepreneurship and innovation in the local workforce. (IGC, JP) [Source: *VCEVSP Strategy C, modified*]"
- EV-4.2 **should read:** "The County shall support the development of industries and businesses that promote and enhance environmental sustainability, greenhouse gas reductions, decarbonization, climate change adaptation, resiliency, and renewable energy generation, storage, and transmission, including solar power, wind power, wave energy and other appropriate renewable sources. The County shall promote the efforts of existing businesses that meet green business criteria and encourage them to become more diverse and inclusive in their daily operations, organization, and local impact; provide job training in green building techniques and regenerative farming and trainings on starting social enterprises built on cooperative business models; and strive to build green technologies into and decarbonize existing government buildings and facilities. (MPSP, JP) [Source: *New Policy*]"
- EV-4.3 **should read:** "The County shall encourage the development and expansion of businesses and business models (eg. cooperatives) that advance social equity, inclusivity and fairness, environmental quality, and economic sustainability, as well as capitalize on key industry strengths. Economic sustainability includes planning and preparation for disaster response and long-term resiliency of businesses and economic assets in the county. (JP) [Source: *New Policy*]"

I58-1  
cont.

Within the Climate Action Plan, I see opportunities to make Ventura County a stronger leader in both reducing our contribution to the climate crisis as well as addressing social/environmental injustice. One urgent need in the Climate Action Plan is to establish a framework for making the implementation (and success) of the Plan observable and measurable so that the public can hold polluters and public officials accountable if they fail to meet the goals established in the Plan – that framework should include some details on the specific indicators chosen to measure implementation/success of the Plan. I would suggest that the planners and decision-makers working on this update establish close contact with CFROG (Climate First: Replacing Oil and Gas) to set up an appropriate framework. The framework should also have a robust public outreach component where local stakeholders are invited into the assessment and monitoring of the Climate Action Plan on an iterative basis. The public outreach component of the monitoring protocol should center around the needs of Ventura County’s vulnerable, disadvantaged, and/or historically marginalized communities and meaningfully include their voices.

I58-2

<b>Letter I58</b>	<b>Erik Fruth</b> February 27, 2020
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- I58-1      The comment provides suggested edits to policies proposed in the 2040 General Plan related to social justice, environmental justice, and inclusivity and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I58-2      The comment provides suggestions for the 2040 General Plan and is not related to the adequacy of the draft EIR. Specifically, the comment requests the inclusion of programs that provide a framework for implementation of the greenhouse gas-related policies and programs of the 2040 General Plan that is observable, measurable, and provides for public participation. Note that the programs in the 2040 General Plan would largely achieve these goals. See, for example, Programs Z, AA, BB, and CC of the Conservation and Open Space Element. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**From:** Fiona Bremner <info@email.actionnetwork.org>  
**Sent:** Friday, February 21, 2020 4:58 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Climate change has environmental impacts!

Letter  
I59

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to [Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

I59-1

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I59-2

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I59-3

I want an EIR that covers major climate impacts via a systematic plan.

In addition, I feel the plan should restore the decisions of the Board of Supervisors to require that all new wells collect gases rather than flare or vent and also that gas-fueled lawn and garden equipment should be banned.

I59-4

Thank you—

Fiona Bremner

Fiona Bremner  
[fbremner@rocketmail.com](mailto:fbremner@rocketmail.com)  
418 S. Dos Caminos  
Ventura, California 93003

<b>Letter I59</b>	<b>Fiona Bremner</b> February 21, 2020
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This comment letter repeats many of the same comments provided in Letter I3. The responses below provide cross references to the portions of Letter I3 where responses to the same comments have already been provided.

- I59-1      Refer to response to comment I3-1 regarding the commenter's concerns about climate change and the draft EIR analysis.
- I59-2      Refer to response to comment I3-2 regarding the use of the most current climate change science in the draft EIR analysis.
- I59-3      Refer to response to comment I3-3 regarding suggested mitigation measures.
- I59-4      Refer to Master Response MR-4, Section MR-4.F Flaring, regarding the findings and conclusions related to flaring in oil and gas operations. Refer to response to comment O1-29 for discussion of the recommendation to ban gas-fueled lawn and garden equipment.

**From:** Fred J Ferro <fferro@naicapital.com>  
**Sent:** Tuesday, February 25, 2020 12:44 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan Draft EIR comment

Letter  
I60

ATTN: Planning Division

Thank you for your time in preparing this document and for receiving my comments. My name is Fred J. Ferro and I have serious concerns about areas related to our local oil and gas industry. The DEIR contains false and ill-advised policies affecting the local oil and gas industry without proper evidence and analysis.

I60-1

The policy COS-7.4 mandates the electrically powered equipment be used for oil and gas exploration and production. The DEIR makes this mandate of the oil and gas industry but does not apply this mandate to other industries. First of all, that is blatant in its disregard of an industry that provides thousands of high-paying jobs and provides tax revenues that support vital community services and local education. This mandate that is unfairly targeted to oil and gas should be further analyzed for economic impacts.

I60-2

Furthermore, preventing a permitted land use such as extraction of energy resources would be a public taking. The DEIR needs to correct this failure to recognize and analyze the public taking as a result of these policies.

These policies must be corrected and further studied is this document is to be considered complete. Upon further analyzing these issues, the document will need to be recirculated instead of rushed through. Similarly, more recent available County Ag Commissioners data could and should have been used for discussion of the impacts of proposed changes affecting the local agricultural industry.

I60-3

I60-4

Thank you for your time,

Fred J.Ferro

Fred J Ferro | Vice President  
 300 Esplanade Dr., Suite #1660, Oxnard, CA 93036  
 fferro@naicapital.com | CalBRE Lic # 00873828

Office 805-278-1400 x5469  
 Fax 805-278-1414

Bio | vCard | Research

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<b>Letter I60</b>	<b>Fred J Ferro</b> February 25, 2020
I60-1	The description and concerns related to the oil and gas industry of the commenting individual are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. See responses to comments I60-2 through I60-4, below, regarding policies addressed in the draft EIR that pertain to the oil and gas industry.
I60-2	<p>The comment addresses implementation of Policy COS-7.4 in the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.</p> <p>Further, the comment states that the economic impacts of implementing Policy COS-7.4 should be analyzed. However, EIRs are not required to treat a project's economic or social effects as significant effects on the environment (State CEQA Guidelines, § 15131). Social and economic effects need only be considered in an EIR where there is a clear link between those economic or social effects and physical environmental changes. The economic issues raised in this comment would not result in any adverse physical changes to the environment not already addressed in the draft EIR. Refer to Master Response MR-4, Section MR-4.B, "Antiquated Permits and Takings," regarding takings. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopted a final 2040 General Plan.</p>
I60-3	Regarding revisions to Policy COS-7.4, refer to response to comment I60-2, above. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.
I60-4	The comment states that recent available County Agricultural Commissioner data should have been used in discussing impacts that would affect the local agricultural industry. It is unclear which data from the County Agricultural Commissioner the commenter refers to. The data used for the impact analysis accurately represent existing physical conditions at the time of publication of the notice of preparation in January 2019 (refer to Section 4.2, "Agriculture and Forestry Resources," in the draft EIR). Nonetheless, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.



Gabriel R. Duarte  
4014 Brindisi Place  
Moorpark, CA 93021

Letter  
I61

February 27, 2020

Ventura County Board of Supervisors  
Attn: Susan Curtis, Manager, General Plan Update Section  
800 South Victoria Avenue, L#1740  
Ventura, CA 93009-1740

I'm writing to you as a concerned resident of the County regarding the viability of the oil and gas industry in Ventura County.

I61-1

The 2040 General Plan Draft EIR fails to give proper analysis to oil and gas mineral resources.

Neither the EIR nor the Background report provide a complete and thorough description of the existing, current regulatory setting that oversees the management and production of mineral resources in the County and the State of California. The EIR and the Background Report only disclose federal and state agencies that regulate pipelines and flaring, which is not applicable to all mineral resources that must be analyzed in an EIR under CEQA guidelines. The EIR should be revised to include an overview and description of all potential regulations, regulatory bodies, and programs that regulate mineral resources in Ventura County.

I61-2

The EIR fails to actually analyze for direct and indirect impacts to mineral resource zones that will occur as a result of the 2040 General Plan. The County admits that Land Use Designation changes in the 2040 General Plan will result in changes to land uses OVER known and important mineral reserves. But neither the EIR nor the Background Report provide any information regarding estimated and anticipated "buildout" in terms of acreage, actual location, number of dwelling units, and development density and intensity. These incompatible land uses will significantly impact future mineral resource production and must be evaluated and mitigated for in the EIR.

I61-3

The EIR never addresses indirect impacts to mineral resource development that will occur under the 2040 General Plan. As incompatible land uses (such as residential development) occur on or adjacent to mineral production and mineral reserves, compatibility conflicts will increase. Reasonably foreseeable indirect impacts include nuisance complaints, traffic conflicts, theft, vandalism and attempted trespass on mineral production sites. The EIR must analyze and evaluate these impacts on the ability to produce mineral resources in the County.

The Draft EIR is lacks critical analysis and must be corrected and recirculated to ensure a fair process for Ventura County residents.

I61-4

Thank you,



<b>Letter I61</b>	<b>Gabriel R. Duarte</b> February 27, 2020
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- I61-1 The commenting individual's concerns related to the oil and gas industry and the draft EIR's analysis of oil and gas mineral resources are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I61-2 Refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR. The commenter indicates that the draft EIR and Background Report do not provide a complete description of the existing and current regulatory setting for production of mineral resources. The commenter does not specify the additional information regarding the regulatory setting applicable to analysis of impacts to mineral and petroleum resources that needs to be included in the EIR.
- The Background Report Section 8.4, "Mineral Resources," 8.5, "Energy Resources," and Section 10.2 "Legal and Regulatory Framework for Water Management (Class II Underground Injection Control Program)," provide relevant regulatory information necessary for understanding and evaluating the impacts of the 2040 General Plan on petroleum resources. Additionally, the draft EIR Mineral and Petroleum Resources Section 4.12.1, Background Report Setting Updates, includes additional information laws and regulations that pertain to petroleum development. This includes federal laws and regulations related to gas pipelines, state laws and regulations related to the California Pipeline Safety Act of 1981, Ventura County Air Pollution Control District (VCAPCD) Rule No. 71.1 – Crude Oil Production and Separation and Rule No. 54 – Sulfur Compounds, VCAPCD Primary (Non-Emergency) Flares, VCAPCD Emergency Flares, and VCAPCD Permitted Flare Variances, and Non-Coastal and Coastal Zoning Ordinances. In the response to this comment, and based on the April 9, 2020 comment letter from the California Geologic Energy Management Division (CalGEM) describing its current regulatory program, the regulatory framework section has been augmented. The enhance discussion of regulatory framework would not alter the findings or analysis in the EIR. The augments to the regulatory setting for Section 4.12 are provided in final EIR Chapter 3, "Revisions to the Draft EIR."
- I61-3 The commenter asserts that the draft EIR fails to analyze impacts to mineral resource zones that would occur as a result of implementation of the 2040 General Plan. The draft EIR Section 4.12.2 Environmental Impacts and Mitigation Measures (page 4.12-5) indicates that "To determine the potential for the 2040 General Plan to conflict with the extraction of mineral resources, the proposed land use diagram was compared to maps of aggregate resources maintained by the State (mineral resource zones mapped by the California Division of Mines and Geology [now known as the California Geological Survey]) and County (as Mineral Resource Protection [MRP] overlay zone) described in the Background Report. The potential for physical changes within identified mineral resource

zones (MRZs) was determined using geographic information system software. Specifically, the analysis focused on MRZ-2 lands, which are identified in the County's NCZO with an MRP Overlay. Consistent with ISAG [Initial Study Assessment Guidelines] Section 3a, any land use proposed on or immediately adjacent to land zoned in the MRP Overlay designation or adjacent to a principal access road to a property with the boundaries of an existing conditional use permit for mineral (e.g., aggregate) resources extraction is considered to have the potential to hamper or preclude access to mineral resources."

The draft concludes that with the implementation of policies proposed in the 2040 General Plan, the potential for development on or adjacent to mineral resources that are zoned, mapped, or permitted for extraction, which could hamper or preclude extraction of the resources, would be less than significant (4.12-10) for Impact 4.12-1: Result in Development on or Adjacent to Existing Mineral Resources Extraction Sites or Areas Where Mineral Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Extraction of the Resources (4.12-9)). Additionally, the draft EIR concludes that future development would not be anticipated to result in the loss of a known mineral resource that would be of value to the region and the residents of the State and this impact would be less than significant (4.12-10) for Impact 4.12-2: Result in the Loss of Availability of a Known Mineral Resource That Would Be of Value to the Region and the Residents of the State (4.12-10).

Refer to response to comment O5-90 regarding the interplay between the land use designations in the 2040 General Plan and mineral resource zones and Master Response MR-2 for a detailed discussion of how buildout was analyzed in the draft EIR. Response to comment O9-8 provides a discussion of the potential for indirect impacts due to incompatible land uses.

I61-4

The comment states that the draft EIR does not include the analysis requested in the above comments. For the reasons described in response to comments I61-1 and I61-2, above, the draft EIR analysis is adequate. Also, refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** garry star <gstar42@hotmail.com>  
**Sent:** Monday, February 24, 2020 9:55 AM  
**To:** General Plan Update  
**Subject:** Climate Action Plan (CAP) is seriously incomplete

**Letter  
I62**

Buffers should be increased from the currently proposed 1,500 feet to 2,500 feet.	I I62-1
Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.	I I62-2
Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.	I I62-3
Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions.	I I62-4
The county should adopt the strongest possible measures to ensure that greenhouse gas emissions are curbed to protect air quality and to ensure a safe, sustainable future for all county residents.	I

<b>Letter I62</b>	<b>Garry Star</b> February 24, 2020
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- |       |   |
|-------|---|
| I62-1 | Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.   |
| I62-2 | Refer to Master Response MR-4, Section MR-4.G Pipeline Requirements, regarding the findings and conclusions related to pipelines in oil and gas operations.   |
| I62-3 | Refer to Master Response MR-4, Section MR-4.F Flaring regarding the findings and conclusions related to flaring in oil and gas operations.  |
| I62-4 | The comment suggests revising the policies proposed the 2040 General Plan to achieve measurable, enforceable reductions in GHG emissions. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions. |

FEB 22, 2020 AM 9:49

**VIA ELECTRONIC MAIL:** [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

February 25, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

**Letter  
I63**

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I63-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I63-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I63-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

I63-4

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I63-4  
cont.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I63-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I63-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I63-7

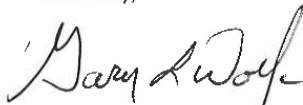
In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I63-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I63-9

Sincerely,



P.O. Box 1268  
Ventura, CA 93002

<b>Letter I63</b>	<b>Gary L Wolfe</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I63-1          Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I63-2          Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I63-3          Refer to response to comment I4-3 regarding water availability and cost.
- I63-4          Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I63-5          Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I63-6          See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I63-7          Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I63-8          The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I63-9          Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Curtis, Susan  
**Sent:** Wednesday, February 26, 2020 8:09 AM  
**To:** Simmons, Carrie  
**Subject:** FW: Ventura County general plan and climate change

**Letter  
I64**

Susan Curtis | Manager  
 General Plan Update Section  
 susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division P. (805) 654-2497 | F. (805) 654-2509  
 800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740 Visit the Planning Division website at [vcрма.org/planning](http://vcрма.org/planning)  
 Ventura County General Plan Update. Join the conversation at [VC2040.org](http://VC2040.org) For online permits and property information, visit VC Citizen Access

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-----Original Message-----

From: Geoffrey Dann <[gdann@mac.com](mailto:gdann@mac.com)>  
 Sent: Tuesday, February 25, 2020 9:11 PM  
 To: Curtis, Susan <[Susan.Curtis@ventura.org](mailto:Susan.Curtis@ventura.org)>  
 Subject: Ventura County general plan and climate change

Ms Curtis -

Others have written more thoroughly on this subject than I can, so I am just adding my voice. Ventura County should be a national leader to mitigate the effects of climate change, to stop or reverse climate change, to move us to long-term sustainable ways of life, to reverse the last century of "better living through chemistry". Ventura County has abundant natural resources and human resources to make these things happen.

thanks

Geoffrey Dann  
 184 N Wake Forest Ave, Ventura 93003

I64-1

**Letter  
I64**

**Geoffrey Dann**  
 February 25, 2020

I64-1

The comment addresses the 2040 General Plan and is not related to the adequacy of the draft EIR, therefore no further response is required. The comment also expresses concerns about climate change, which is addressed in the draft EIR in Section 4.8, "Greenhouse Gas Emissions." This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.



006 MP 02, 2020

George A. Graham  
c/o Hoffman, Vance & Worthington  
1000 S. Seaward Avenue  
Ventura, CA 93001

Letter  
I65

February 24, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I65-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I65-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I65-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I65-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I65-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I65-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I65-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I65-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I65-9

Sincerely,

  
George A. Graham

<b>Letter I65</b>	<b>George A Graham</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I65-1 Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I65-2 Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I65-3 Refer to response to comment I4-3 regarding water availability and cost.
- I65-4 Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I65-5 Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I65-6 See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I65-7 Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I65-8 The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I65-9 Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

Geraldine Gramckow  
 c/o Hoffman, Vance & Worthington  
 1000 S. Seaward Avenue  
 Ventura, CA 93001

Letter  
 I66

006 MAR 07 2020

February 24, 2020

Ventura County Board of Supervisors  
 Attn: RMA Planning Division  
 General Plan Update  
 800 Victoria Avenue L#1740  
 Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I66-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I66-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I66-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

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I66-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I66-9

Sincerely,

  
Geraldine Gramckow

<b>Letter I66</b>	<b>Geraldine Gramckow</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

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Gloria Valladolid  
1129 Maricopa Hwy B-251  
Ojai Ca 93023

Letter  
I67

REC'D FEB 26 2020

February 22, 2020

Ventura County Resource Management  
Agency, Planning Division  
800 S. Victoria Ave., L #1740  
Ventura, CA 93009-1740

**Re: Preliminary Draft General Plan Update  
(Planning Division Case Number PL17-0141)**

Here are my comments and recommendations regarding the  
Preliminary Draft General Plan Update ("Preliminary Draft").

I agree with CFROG's comments. Therefore, include me as a strong  
citizen supporter of their comment letter. Ditto to their  
recommendations to the EIR.

Sincerely



Gloria Valladolid

I67-1

<b>Letter I67</b>	<b>Gloria Valladolid</b> February 22, 2020
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I67-1      The commenter refers to a letter submitted by Climate First: Replacing Oil & Gas. See responses to Letter O20.

**From:** Gordon Clint <ghclint@yahoo.com>  
**Sent:** Sunday, February 23, 2020 3:50 PM  
**To:** ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>  
**Cc:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** VC2040 General Plan Comments

**Letter  
I68**

**To: Board of Supervisors**  
**cc: Susan Curtis**  
**From: Gordon Clint**  
 4102 Greenwood Street  
 Newbury Park, CA 91320

**I am signing on to this letter because I care about the deteriorating condition of my County and planet. We must approve a plan that will provide a just and sustainable future. Please strengthen the climate aspects of the 2040 General Plan consistent with the following concerns:**

With worsening climate change impacts, we reiterate and amplify the concerns the people expressed in January of last year about "climate change and GHGs, and the effects of continued oil and gas extraction including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards."

Our county is warming faster than any other in the nation, our ocean is becoming more hostile to marine life, our last drought was the most intense and lasted longest, and our history of costly floods will be dwarfed when future atmospheric rivers pour over our valleys. Our house is on fire. We need a thorough plan and environmental impacts analysis based on the latest science.

Ventura County's plan matters. Our larger cities are making climate action plans and look for your example of leadership. The environmental impact from what we do to mitigate climate impacts at the global scale is profoundly influential in trying to stop runaway climate change. This is explained in a new report Insights from the California Energy Policy Simulator about the role of the State of California in the world. Ventura County as a local government hit hardest by climate impacts must step up and meet serious goals. "Insights about California's climate policies are at the forefront of global efforts to battle climate change. The state's leadership and success so far have helped maintain momentum despite political headwinds. If California faltered, global efforts to reduce GHG emissions would be dealt a major setback. Meanwhile, the severe risks from runaway global warming are becoming more tangible as the state suffers from wildfires supercharged by climate change."

I68-1

**A. Four Overall Comments:**

We are grateful for the expertise at the law firm of Shute, Mihaly and Wineberger retained by CFROG regarding CEQA. We have appreciated their past comments. We join them in continuing to request the following:

1. Count ALL GHGs that result from activity in our county: Count all burning of oil and gas originating in our county and count all fugitive methane from wells in our county and from methane entering our county that was not counted at the jurisdiction of origin. Do the math on the GHG footprint for heavy exports. We want to mitigate our fair share of all climate impacts from activities within Ventura County. We have to know what they are. Worrying about double counting is not acceptable. Just worry that you haven't counted every cause of climate impacts that we are morally and legally responsible to mitigate with a comprehensive inventory and a systematic plan.

I68-2

2. Use the latest science to calculate GWP of methane: The global warming potential of GWP is nearly 40 percent greater than what you are using. The International Panel on Climate Change states that over a 20 year period, methane has a GWP of 84 compared to carbon dioxide (up from their previous estimate of 72). The US EPA estimates it at 87 and recent scientific experts put the estimate at 96. We must know the true environmental impact of methane emissions. A complete and scientifically valid GHG inventory is required for a CEQA-compliant Climate Action Plan.



<p>3. Use the emissions reduction goal from Governor Brown’s Executive Order B-18-55 “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing greenhouse gas emissions.” It is an inadequate compromise, but not as much as the SB 32 goal of 80% below 1990 levels by 2050. City of LA plans to stay within a net zero carbon budget between now and 2045. The proposed GHG reductions in the VC2040 Draft of 41 percent below 2015 levels by 2030, 61 percent by 2040, and 80 percent by 2050 are not ambitious enough for us to do our part to mitigate the climate chaos happening faster than scientists have predicted.</p>	I68-3
<p>4. Policies and programs must meet the goal: It does not take an in-depth analysis to see that this plan will not achieve the 2030 goal of 40% reduction in GHGs below 1990 levels. A new report Insights from the California Energy Policy Simulator shows that the State of California will fall short of that goal by at least 15 and as much as 45 MMT CO2e. We have and continue to advocate for a goal aligned with Governor Brown’s Executive Order to achieve carbon neutrality as soon as possible and no later than 2045.</p>	
<p>B. Some Comments about Impacts and Mitigation</p> <p>The environmental impacts that concern us are those resulting from governments not making and carrying out plans to mitigate climate change. Your draft analysis does not include most of them. Table B in the Executive Summary is not even half finished. Some of the more serious impacts are missing from the draft analysis. Here are a few of our concerns:</p>	I68-4
<p>1. Aesthetics, Scenic Resources and Light Pollution and Agriculture and Forest Resources: Mitigation programs are needed to protect our resources from degradation from significant climate impacts. The loss of soil in particular is associated with the downfall of civilizations.</p>	I68-5
<p>2. Air Quality: The emissions impacts from exceeding criteria pollutant thresholds and also greenhouse gases seem significant and can be mitigated.</p>	I68-6
<p>3. Biological Resources: The new implementation program is a good start to “update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria and evaluate discretionary development that could potentially impact sensitive biological resources”. Two kinds of impacts are missing. 1) Climate Change. A major mitigation is the restoration of wetlands which should be at a 2:1 or greater ratio. Stormwater management is another mitigation that reverses the loss of vegetation from drought and floods and supports the restoration of all of the indigenous biology that makes an ecosystem function to maintain the small water cycles. 2) Toxic Pesticide and Herbicide Use and Drift. This must be part of the agenda of a Program for Protection of Sensitive Biological Resources to promulgate the mitigations provided by Integrated Pest Management. Pest management policy must align with the recommendations of the California Department of Pesticide Regulation Roadmap for Integrated Pest Management some of which have climate mitigation co-benefits.</p>	I68-7
<p>4. Energy: We want a workshop to learn how it is deemed less than significant to allow wasteful, inefficient, or unnecessary consumption of energy resources.</p>	I68-8
<p>5. Greenhouse Gas Emissions: The climate change impacts are so dire that the mitigations need to be benchmarked to be achieved before it is too late to reverse runaway climate chaos. At minimum we demand a systematic plan for decarbonization of county facilities and electrification of the transportation system.</p>	I68-9
<p>6. Hazards, Hazardous Materials, and Wildfire: The impacts of toxic explosions, leaks, and spills and the drift of regulated materials and the ignorance of the public about toxic impacts must be addressed where feasible through mitigations that regulate the use and transport of hazardous materials. We have recommended feasible mitigations for people being exposed to the risk of wildfires that have not been accepted by decision-makers.</p>	I68-10
	I68-11

7. Hydrology and Water Quality: Impacts from climate change and poor land management have led to grave threats to water supply and water quality. These are highly significant--ground water overdraft, overuse and degradation of water quality, erosion, flooding, and siltation. (Impact 4.10-12) The failure to restore small water cycles to keep stormwater in the uplands and maintain forest health is one of the most serious impacts being mitigated in many places through a paradigm shift about stormwater management. Mitigation is essential--water is life. It requires an integrated water management plan that involves every sector working on every mitigation of which we are aware.	I68-12
8. Land Use and Planning We want an analysis of incompatible land uses and new development with negative health implications. Closing wells near sensitive sites is a mitigation. Environmental Justice is not examined in the draft EIR.	I68-13
9. Mineral and Petroleum Resources: We want an analysis of the impact of the scenario in which wells have been put on hold and the operator cannot close the wells for lack of funds. We have no choice. The wells must be closed properly. Fields must be restored to functioning ecosystems to help mitigate climate change impacts. We need insurance as well as bigger bonds.	I68-14
10. Traffic and Transportation: Tailpipe emissions is an extremely significant environmental impact. The mitigation aimed for in the CTM-C: Vehicle Miles Traveled (VMT) Reduction Program needs assurances of effectiveness via a clear description of what "conditions warrant providing additional mitigations and programs"? This is far too vague to be a mitigation for this significant impact. We have no alternative but to reliably cut GHGs in the transportation sector.	I68-15
11. Utilities: Failure to develop wholesale and commercial scale renewable energy generation and microgrids is a significant environmental impact because it has forced us to have to get our electricity from fossil fuels via transmission lines that spark wildfires. Community microgrids are a feasible mitigation.	I68-16
12. Waste Management: Failure to properly manage waste has a highly significant environmental impact, especially when it produces methane super-emitter landfills that is driving climate change, but also the failure to reuse and recycle consumer goods and the materials and equipment discarded by commercial enterprises. We need a more comprehensive approach for mitigation of these impacts.	I68-17
C. The following policy recommendations for the Draft Plan could help the Plan achieve the GHG reduction goals to mitigate climate change impacts and help the EIR be more relevant to the climate crisis.	I68-18
Land Use and Community Character: We endorse the comments submitted by Bruce Smith to more firmly assure preservation of agricultural land and open space. We point out the lack of analysis of Environmental Justice policy issues.	I68-19
Circulation, Transportation, and Mobility:	
1. No overriding considerations should allow a project to NOT reduce VMT unless all of the vehicles have zero emissions that will use the proposed project.	I68-20
2. CTM 3-9 to widen SR 118 has a significant environmental impact.	I68-21
3. Benchmarks to reduce VMT need to be more clear and the plan needs a review with public input every two years until 2028 and then no longer than every five years.	I68-22
4. Parking programs should be included in ways that reduce single-occupancy car trips.	I68-23

Public Facilities, Services, and Infrastructure:

1. Enroll residents in a program to reduce CO2 emissions in their neighborhoods. Ex: Cool Block or Transition Streets.

2. PFS 2.1 must be revised to say include rather than encourage 'Sustainable Plans and Operations' in order to be considered a mitigation of climate change impacts from greenhouse gas emissions.

I68-24

3. Policy PFS 7.1 should be revised to delete the need for access to gas. The environmental impact from use of natural gas requires carbonizing buildings beginning with no gas connections to new residences . It is therefore contradictory to ensure access to gas.

4. Local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. This is not the same as "Smart Grid Technology". You need experts who know the cutting edge of this field to help write coherent policy on this topic.

I68-25

5. Zero Waste The County shall achieve zero waste (via a suite of policies to reduce, reuse, and recycle) with no organic waste going to landfills by 2023

6. Zero Waste Policy for Meetings and Events Design and implement a zero waste policy for meetings and events sponsored or permitted by the County to minimize waste and rescue surplus edible food

7. Compostable Take-Out Foodware Require that take-out foodware be made with material compostable in solid waste processing facilities within 60 days

I68-26

8. Reduce Solid Waste by Phasing Out Single-Use Plastic Evaluate how to best reduce solid waste generation per capita by at least 15% by 2030 including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene

9. Ban Expanded Polystyrene

Conservation and Open Space:

1. Reduce oil and gas production by 40% by 2025 via higher monitoring standards and 2500 ft buffer zones near sensitive sites; reduce production to zero by no later than 2040.

2. Phase-Out of Oil and Gas Production The County shall prohibit new drilling and shall regulate existing wells to assure steady closing of wells beginning near residential and commercial areas.

3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.

4. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

I68-27

5. Detect and curb methane emissions from "super-emitter" sites as identified by NASA.

6. Tax oil and gas production, and related uncaptured methane to raise the needed revenues to fund urgent climate programs to replace high-emission vehicles with a priority on trucking and freight companies, fishing businesses, general contractors and K-12 schools.

7. Require a fully accountable performance bond for all new wells to cover cost of closure Cite LAT article (maybe put on website and link to it).

8. Establish an insurance fund that oil and gas producers contribute to that will cover accidents and closing wells if the producer goes bankrupt.

9. Ban gas-fueled lawn and garden equipment. (Ex: City of Ojai)
10. Accelerate capture of legacy HFCs Enlist the public and private to find and destroy existing stocks of HFC's (refrigerant gases with extremely high Global Warming Potential).
11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.
12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.
13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.
14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.
15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.
16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30% by 2030.
17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.
18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.
19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

I68-28

#### Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.
2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N2O) emissions and nutrient runoff.
3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.
4. Reward Regenerative Farmers with Digestate and Compost from Food Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO2.

I68-29

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

I68-30

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.
4. Maritime Economy. Facilitate a sustainable maritime economy using restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.
5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.
6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.
7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.
8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

I68-31

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

I68-32

<b>Letter I68</b>	<b>Gordon Clint</b> February 23, 2020
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This comment letter repeats many of the same comments provided in Letter I29. The responses below provide cross references to the portions of Letter I29 where responses to the same comments have already been provided.

- I68-1      The concerns of the commenter regarding climate change and importance of the County's General Plan are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I68-2      Refer to response to comment I29-3 with respect to the treatment of methane and oil and gas extraction.
- I68-3      Refer to response to comment I29-4 with respect to statewide greenhouse gas (GHG) reduction goals.
- I68-4      The commenter's concerns related to climate change are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I68-5      Refer to response to comment I29-6 regarding mitigation for climate change impacts.
- I68-6      Refer to response to comment O1-7 regarding criteria air pollutant emissions.
- I68-7      Refer to response to comment I29-8 regarding impacts and mitigation related to climate change and stormwater management.
- I68-8      The comment addresses the draft 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I68-9      Refer to response to comment I29-10 regarding the evaluation of energy use in the draft EIR.
- I68-10     Refer to response to comment I29-11 for a discussion of decarbonization and electrification of the transportation system.
- I68-11     Refer to response to comment I29-12 regarding the use and transport of hazardous materials as well as feasible mitigation.
- I68-12     Refer to response to comment O1-13 regarding hydrology and water quality.
- I68-13     Refer to response to comment I29-14 regarding incompatible land uses, health risk, and environmental justice.
- I68-14     Refer to response to comment I29-15 regarding economic effects and climate changes effects.

I68-15	Refer to response to comment I29-16 for discussion of 2040 General Plan Policy CTM-C.
I68-16	Refer to response to comment I29-17 regarding California Environmental Quality Act requirements for the analysis of GHG effects.
I68-17	Refer to response to comment I29-18 regarding renewable energy and microgrids.
I68-18	Refer to response to comment I29-19 regarding regulations and policies related to solid waste and recycling.
I68-19	Refer to response to comment I29-20 regarding comments submitted by Bruce Smith. Also, see responses to Letter I20 from Bruce Smith.
I68-20	Refer to response to comment I29-21 regarding use of a statement of overriding considerations and evaluation of vehicle miles traveled.
I68-21	See response to comment I29-22 regarding concerns about environmental impacts associated with modifications to State Route 118 proposed in the 2040 General Plan.
I68-22	Refer to response to comment I29-23 regarding vehicle miles traveled benchmarks.
I68-23	Refer to response to comment I29-24 regarding suggested topics to be considered in the 2040 General Plan.
I68-24	Refer to response to comment I29-24 regarding suggested revisions to proposed 2040 General Plan policies.
I68-25	Refer to response to comment I29-26 regarding proposed renewable energy policies in the 2040 General Plan.
I68-26	Refer to response to comment I29-27 regarding suggested topics to be considered in the 2040 General Plan.
I68-27	Refer to response to comment I29-28 regarding the commentary on the County's policies and procedures relative to the oil and gas industry.
I68-28	Refer to response to comment I29-29 regarding suggested topics to be considered in the 2040 General Plan.
I68-29	Refer to response to comment I29-30 regarding suggested topics to be considered in the 2040 General Plan.
I68-30	Refer to response to comment I29-31 regarding water resources.
I68-31	Refer to response to comment I29-32 regarding suggested topics to be considered in the 2040 General Plan.
I68-32	The comment emphasizes the need for an adequate plan that sufficiently reduces GHG emissions. This comment is conclusory in nature and does not raise a significant environmental issue for which a response is required.

169-1  
169-2  
169-3  
169-4

VIA ELECTRONIC MAIL: [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

Letter  
169

February 25, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I69-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I69-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I69-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

I69-4



impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I69-4  
cont.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I69-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I69-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I69-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I69-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I69-9

Sincerely,

*Gregory H. Smith*

P.O.Box 25010  
Ventura, CA 93002

<b>Letter I69</b>	<b>Gregory H Smith</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I69-1          Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I69-2          Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I69-3          Refer to response to comment I4-3 regarding water availability and cost.
- I69-4          Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I69-5          Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I69-6          See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I69-7          Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I69-8          The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I69-9          Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

H ELAINE CAVALETTO  
4031 PRICE ROAD, SOMIS, CA 93066  
[elainesomis@msn.com](mailto:elainesomis@msn.com) 805-479-1422

Letter  
170

February 27, 2020

Ventura County Board of Supervisors:  
[Susan.Curtis@ventura.org](mailto:Susan.Curtis@ventura.org)

Re: 2040 General Plan Draft EIR Comment

I have some concerns about the 2040 General Plan Report (EIR) that has recently been released. With 700+ policies and implementation programs how can you say you have finished this plan in 6 weeks? 12-18 + months is, what I am understanding, what it takes to adequately complete all the analysis and their impacts.

As an 85 year old farmer, in this county since 1957, it appears that more and more you are not looking what is best for individuals nor long/short term solutions to many issues.

As with a recent issue, a few people stood up talking about “their rights” and to heck with other’s rights. Maybe the initial decision, to approve the crop, was made in haste. As well as extending the ban to plant the crop to 10 ½ months. Why not go for another 45 days? You have just taken income from those that farm and taken the side of those who “yell” the loudest.

Wildfire Corridor is another issue – restrictions on brush removal leads to increased fuel load and increased wildfire risk. Did your decisions make things better or worse?

Why would you require small development projects to purchase farmland to preserve in perpetuity? Where are small pieces of farmland available and who will manage these small ag preservation parcels. Again, as I see it, take away from those in agriculture to give to others who have not put in any dollars, sweat or tears in the land. Again, increasing regulatory demands on agriculture.

How current was the background information that was used to understand and evaluate the County’s impact analysis. My understanding is that it was older than 2015.

What does the analysis show on these indirect impacts that affect landowners? Such as: theft and vandalism, complaints by those who know nothing about agriculture, water competition, speeding cars in rural areas without regard for farm machinery, etc.

There are many other areas that I feel were not considered and most certainly will continue to increase farming operational costs such as: converting ag equipment to electric, requiring all electric water pumps, water supply increases.

Sincerely,  
H Elaine Cavaletto

cc: [chris@rinconstrategies.com](mailto:chris@rinconstrategies.com) and [llampara@colabvc.org](mailto:llampara@colabvc.org)

I70-1

I70-2

I70-3

I70-4

I70-5

<b>Letter I70</b>	<b>H Elaine Cavaletto</b> February 27, 2020
I70-1	The commenting individual's concerns regarding the EIR are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
I70-2	The comment states that "wildlife corridor" is an issue and that restrictions on brush removal leads to increased fuel load and increased wildfire risk. The commenter's reference to restrictions on brush removal within wildfire corridors is unclear. This term is not used in the draft 2040 General Plan. Refer to response to comment I4-6 regarding the County's Habitat Connectivity and Wildlife Corridor ordinances, which are separate from the 2040 General Plan, and the draft EIR's analysis of wildfire impacts.
I70-3	The commenter's references to purchasing farmland for agricultural preservation is unclear and increased regulatory demand are unclear. It is inferred that the commenter may be referring to Mitigation Measure AG-2. Refer to Master Response MR-5 for further discussion of the feasibility and applicability of Mitigation Measure AG-2.
I70-4	Refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
I70-5	<p>The commenter expresses concerns such as theft, vandalism, and speeding cars as potential indirect impacts to landowners. State CEQA Guidelines, Section 15126.2(a) explains that "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment." Therefore, only the environmental impacts caused by adoption of the 2040 General Plan need to be addressed in the EIR. The draft EIR is not required to analyze the impacts of the project to landowners, only the environment. In addition, the 2040 General Plan requires that the County provide adequate law enforcement and emergency services to county residents (Policy PFS-11.1), and future development, in particular on the edges or outside of existing developed areas, to maintain adequate service ratios and other performance standards. See response to comment I2-5 for additional discussion.</p> <p>The comment expresses concern for indirect and direct impacts related to competition for water supplies for agriculture. Refer to response to comment A13-11 regarding water supplies.</p> <p>It is assumed that the commenter is referencing Policy AG-5.2 and AG-5.3 when referring to the conversion of "ag equipment to electric" and "requiring all water pumps." Refer to response to comment A13-10 regarding 2040 General Plan Policies AG-5.2 and AG-5.3.</p> <p>The commenter's reference to water supply increases are vague and no response can be provided.</p>

**From:** Harmony Eckberg <harmonyeckberg@yahoo.com>  
**Sent:** Saturday, February 22, 2020 11:58 AM  
**To:** General Plan Update  
**Subject:** Comments on new Draft Environmental Impact Report

Letter  
I71

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to  
Spam.Manager@ventura.org

**Ventura County must protect our quality of life with bold action on climate in its General Plan Update. This document sets the policies that drive all land-use decisions for the next 20 years, but the current draft is completely inadequate in addressing the climate crisis.**

**A recent report in the Washington Post confirmed that we are the fastest-warming county in the continental U.S.**

**We have seen the catastrophic effect of a warming world in the fierce winds that whipped the Thomas and Woolsey fires out of control and we will not forget the suffering it caused our families and neighbors.**

**Climate change is caused by fossil fuel production and consumption. We must do our part to reduce oil production through thoughtful, rigorous policy to phase it out.**

**Your written comments will let the Board of Supervisors know your concerns...if you don't write, they won't know.**

**Buffer Requirements** – The proposed buffers for locating oil and gas facilities a safe distance from schools and homes are inadequate. Studies show adverse health impacts from oil and gas facilities at distances of at least half a mile.

**Action Needed:** Buffers should be increased from the currently proposed 1,500 feet to 2,500 feet.

**Trucking vs. Pipeline** – Currently, oil and produced water from local oil wells are mostly transported by truck. Trucking creates safety hazards on county roads, exposes residents to toxic diesel pollution, and causes substantial amounts of greenhouse gas emissions. Draft General Plan Policy COS-7.7 attempts to address this problem by requiring newly permitted oil wells to use pipelines instead of trucks to transport oil and produced water. However, the DEIR attempts to undermine Policy COS-7.7, concluding that the added costs of constructing pipeline connections make this policy infeasible and may lead to a loss of petroleum resources. The DEIR proposes to allow trucking if pipelines are deemed infeasible. This would create a loophole allowing oil companies to simply claim that the cost of a pipeline connection is too high.

**Action Needed:** Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

I71-1

I71-2

I71-3

**Flaring** – Draft General Plan Policy COS-7.8 requires gases from all new discretionary oil and gas wells to be collected and used, or removed for sale or proper disposal, instead of being flared or vented to the atmosphere. The policy would allow flaring only in cases of emergency or for testing purposes. This is important because venting and flaring release both toxic gases and powerful climate pollutants like methane to the atmosphere.

The DEIR tries to undermine this policy, too. It concludes that the added costs of treating the gas on site or constructing pipeline connections would make this requirement infeasible and may lead to a loss of petroleum resources. The DEIR instead would allow flaring if conveyance by pipeline is deemed infeasible, creating another loophole that could allow oil producers to simply claim that the cost is too high and continue with business as usual.

**Action Needed:** Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.

I71-4

**Climate Action Plan** – The draft General Plan and the DEIR conclude that the county’s greenhouse gas emissions would have significant impacts. However, the Climate Action Plan proposed as part of the General Plan is inadequate and will not reduce emissions in a meaningful way. Most proposed Climate Action Plan policies are vague and aspirational, relying on noncommittal assurances that the county will “encourage” and “support” change rather than clearly require measurable reductions in climate pollution.

Climate Action Plan policies must result in measurable, enforceable reductions sufficient to meet California’s climate goals. This is important because the General Plan and related Climate Action Plan can be used to streamline approval of future development projects. The county may not carefully analyze the climate consequences of future projects — including discretionary oil and gas development — if those projects claim they’re consistent with the Climate Action Plan. If the Climate Action Plan consists mostly of vague, voluntary, or otherwise unenforceable policies, future projects could easily be found consistent and could evade proper environmental review.

**Action Needed:** Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions.

I71-5

**Greenhouse Gas “Super-Emitters”** – A recent NASA study documents that several Ventura County facilities, including oil and gas operations, are “super-emitters” of powerful climate pollutants. Stationary source emissions, including those from oil and gas operations, make up approximately 26 percent of all emissions in California. The General Plan must include strong policies to detect and curb emissions from these “super-emitters.”

**Action Needed:** The county should adopt the strongest possible measures to ensure that greenhouse gas emissions are curbed to protect air quality and to ensure a safe, sustainable future for all county residents.

Sincerely,

Harmony Eckberg

I71-6

<b>Letter I71</b>	<b>Harmony Echberg</b> February 22, 2020
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- I71-1 The commenter's concerns regarding climate change in Ventura County are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I71-2 Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.
- I71-3 Refer to Master Response MR-4, Section MR-4.G, "Pipeline Requirements," regarding the findings and conclusions related to pipelines in oil and gas operations.
- I71-4 Refer to Master Response MR-4, Section MR-4.F, "Flaring," regarding the findings and conclusions related to flaring in oil and gas operations.
- I71-5 The comment asserts that the greenhouse gas policies of the 2040 General Plan are not actionable. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions. Regarding streamlining approval of future development projects consistent with the 2040 General Plan, the draft EIR includes Mitigation Measure GHG-3, which would remove the CEQA streamlining provision proposed in Program COS-EE from the 2040 General Plan, and specify that the potential GHG emissions impacts of future, discretionary projects be reviewed in accordance with the most recent adopted version of the ISAGs at the time of project-level environmental review. For a full discussion of the potential for the 2040 General Plan to result in GHG emissions that contribute to climate change, refer to Section 4.8, "Greenhouse Gas Emissions," in the draft EIR.
- I71-6 The comment recommends that the County adopt the strongest measures to ensure GHG emissions are curbed, particularly from oil and gas operations that are "super-emitters." Refer to Master Response MR-1 regarding oil and gas operations and how these activities are addressed in the GHG inventory prepared for the 2040 General Plan and draft EIR.

Heather A. Gilchrist-Wise  
8302 Sulphur Mountain Road  
Ojai, CA 93023

Letter  
I72

February 27, 2020

Attn: RMA Planning Division  
General Plan Update  
800 Victoria Ave., L #1740  
Ventura, CA 93009-1740  
[Susan.Curtis@ventura.org](mailto:Susan.Curtis@ventura.org)

Dear Planning Division:

In reviewing the 2040 General Plan Environmental Impact Report (EIR), I have some grave concerns that were not addressed and will affect many people in this county. I have listed some below for your review and response:

I72-1

1. Wildfire risk – EIR states that “managing fuel through activities such as vegetation removal and controlled burns, the County and other agencies would be directly reducing the chance of wildfire as well as fuels that would feed wildfires. This statement does not take into regard that it is in *direct opposite* of County Policies COS-3.2, COS-1.15, Implementation Program COS-H, Implementation Program COS-C and the recent restrictions on brush removal in the Wildlife Corridor. All of these Policies and restrictions will increase wildfire risk and in order to comply with the EIR, must be removed or re-written.

I72-2

2. CEQA requires that indirect impacts be analyzed: Specifically, the impact on agriculture from the buildout planned in the 2040 General Plan. As the population grows, there will be more interactions with farm land. Presently, in most cases, this leads to more costs for the farmer and can cause a negative effect on this industry in this county.

I72-3

3. The EIR states that the policies in the 2040 General Plan will decrease water supply for irrigation, but the County has not evaluated this impact. Reducing water supply for irrigation, or even increasing cost to obtain water, will remove ag lands from production which will affect the County significantly.

I72-4

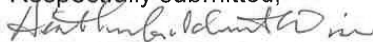
4. The EIR also does not address the impact of the General Plan that will require ag to use all electric equipment and pumps. This is very expensive and will impact this industry considerably.

I72-5

5. The General Plan does not seem to take into effect that agriculture is a major industry in the County and will affect the County's revenues if it does not analyze the negative effects that these new policies will have on this industry.

I72-6

Respectfully submitted,



Heather Gilchrist-Wise



<b>Letter I72</b>	<b>Heather Gilchrist-Wise</b> February 27, 2020
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- I72-1 The commenting individual's concerns regarding the draft EIR are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. Refer to responses to comments I72-1 through I72-6, below, for responses to the commenter's specific concerns.
- I72-2 The comment states that the 2040 General Plan policies would increase wildfire risk and should, therefore, be removed or rewritten. See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard. Note that the County's Habitat Connectivity and Wildlife Corridor ordinances, which were adopted in March of 2019 to provide protections for areas designated as important wildlife corridors within the non-coastal unincorporated area, are separate from the 2040 General Plan currently under review.
- I72-3 The comment states that the California Environmental Quality Act requires indirect impacts to be analyzed and provides an example of indirect agricultural impacts that the comment asserts were not analyzed in the draft EIR. Refer to response to comment I2-5 regarding the analysis of indirect impacts on agriculture resulting from buildout of the 2040 General Plan. Note that the County's Habitat Connectivity and Wildlife Corridor ordinances, which were adopted in March of 2019 to provide protections for areas designated as important wildlife corridors within the non-coastal unincorporated area, are separate from the 2040 General Plan currently under review.
- I72-4 Refer to response to comment I4-3 regarding water availability and cost.
- I72-5 It is assumed that the commenter is referencing Policy AG-5.2 and AG-5.3. Refer to response to comment A13-9 regarding impacts related to urban-agriculture interface.
- I72-6 This comment expresses concerns about the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

c/o Hoffman, Vance & Worthington  
 1000 S. Seaward Avenue  
 Ventura, CA 93001

Letter  
 173

February 24, 2020

Ventura County Board of Supervisors  
 Attn: RMA Planning Division  
 General Plan Update  
 800 Victoria Avenue L#1740  
 Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I73-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I73-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I73-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I73-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I73-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I73-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I73-7

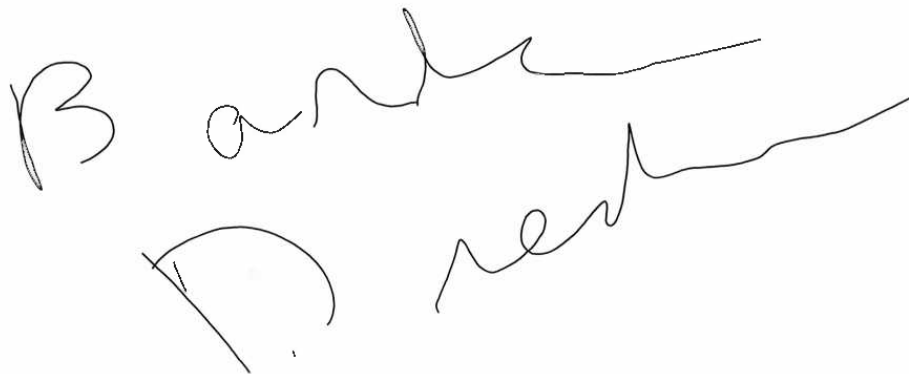
In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I73-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I73-9

Sincerely,



<b>Letter I73</b>	<b>(illegible) C/O Hoffman, Vance, &amp; Worthington</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I73-1      Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I73-2      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I73-3      Refer to response to comment I4-3 regarding water availability and cost.
- I73-4      Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I73-5      Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I73-6      See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I73-7      Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I73-8      The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I73-9      Refer to Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** James Brehm <james.b.brehm@gmail.com>  
**Sent:** Wednesday, February 26, 2020 11:45 PM  
**To:** Curtis, Susan; General Plan Update  
**Subject:** 2040 General Plan Update - Public Comment  
**Attachments:** Letter to Ventura County Regarding Climate Action Plan.pdf

Letter  
174

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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February 26, 2020

Ventura County Resource Management Agency, Planning Division  
ATTN Susan Curtis, Manager, General Plan Update Section  
800 South Victoria Avenue, L #1740  
Ventura, California 93009-1740

#### Regarding a Climate Action Plan for the draft 2040 General Plan Update

To Ms. Curtis and the General Planning Committee,

I am extremely alarmed by the lack of foresight the current draft of the 2040 General Plan update. Climate change is coming to Ventura. Specifically, our county has warmed more than any in the lower-48 states with an average increase of 2.6°C as of December 2019.\* Maybe you are unaware of the science. If we do not drastically alter our course we can expect to witness the following effects by 2100:

- A conservative estimate of 1.8-3.6 feet and possibly up to 10 feet of sea level rise
- Larger, more frequent wildfires
- Water and food shortages from drought and crop failure
- Ocean acidification and increased oxygen-free 'dead zones' which will threaten the existence of all marine life as we know it
- Mass extinction of life on Earth, collapse of ecosystems.
- Increased disease
- Failure of economic markets
- Mass migration of "climate refugees"

I74-1

Get on the right side of history and prove in this General Plan that you value our children more than oil money. Now is the time to act. Those who came before us were not aware of the problem, and those who come after us will be unable to do anything about it. **Now is the only time.** Though there is reference to a Climate Action Plan in the General Plan, it has no teeth. It has no deadlines, it has no actionable goals, and it sits next to policies like this one:

"Through Policy COS-6.2, the County would maintain maps of mineral deposits identified by the State Geologist as having regional or statewide significance and any additional deposits as may be identified by the County . . . the purpose of this overlay zone is to safeguard future access to the resources, facilitate the long-term supply of mineral resources in the county, and notify landowners and the public of the presence of the resources."

[https://vcrma.org/vc2040.org/images/Draft\\_EIR - Jan. 2020/VCGPU-EIR\\_4.12 Minerals\\_Petroleum.pdf](https://vcrma.org/vc2040.org/images/Draft_EIR_-_Jan._2020/VCGPU-EIR_4.12_Minerals_Petroleum.pdf)

We really can't compromise here. This is about survival. Scientific fact: if we (humans) completely halt all new drilling for oil and just suck dry the reserves we're already tapped into, and burn just that, we will be sent over the threshold for catastrophic, feedback loop global warming. It will mean the end of civilization as we know it. This is not worth any amount of money. We must not permit any new extraction, and we must have a plan to draw down the extraction that is already occurring within Ventura County.

I am not writing this because I am an environmentalist, I am writing this because I demand that you protect the future of my children.

I74-1  
cont.I

Respectfully,

James Brehm  
553 North Ventura Ave, Apt E  
Ventura, CA 93001  
631-875-0514

\*If you'd like any references for any of the facts in this letter, I will gladly supply upon request.

\*\*Also, please let me know if there's anything else I can do to help make these changes happen besides sending this message. I am willing to put as much energy as necessary into this if it would help.

<b>Letter I74</b>	<b>James Brehm</b> February 26, 2020
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I74-1      This comment expresses concerns about the 2040 General Plan, specifically with how it addresses climate change. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

The comment asserts that the policies of the 2040 General Plan are not actionable. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.. For a full discussion of the potential for the 2040 General Plan to result in GHG emissions that contribute to climate change, refer to Section 4.8, "Greenhouse Gas Emissions," in the draft EIR.

**From:** Jan Dietrick <jdietrick9@gmail.com>  
**Sent:** Thursday, February 27, 2020 12:51 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Cc:** ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>  
**Subject:** Comment Draft EIR Ag - JDietrick & RWhitehurst

Letter  
175

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[Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

February 27, 2020

Dear Susan Curtis,

Our comments are about the Draft Environmental Impact Analysis of the Agriculture Element of the VC2040 General Plan. We have serious concerns about other chapters, especially Water Resources, but time does not permit us to develop comments.

Before commenting on the topics of food security, resilience, carbon sequestration, regenerative agriculture, inorganic nitrogen based fertilizer, compost, cover crops and low- and no-till, agricultural land conservation and preservation, and Integrated Pest Management, we preface by saying that everything in the General Plan must be seen through the lens of the global climate and ecological crisis and the need for leadership so that the people of Ventura County are confident that the community response meets some minimum standard of social and environmental justice. Climate change necessitates an examination of personal values and a shift of mindset about agriculture policy at the local level.

The VC2040 Environmental Impact Report reflects a great deal of this needed shift, but we see omissions in the coverage of existing conditions in the Background Report and in the scope and/or targeting of the goals, policy and programs. There are five programs added to the EIR that are not in the Draft Plan, so we refer to the EIR except where we have comments about the Goal statements in the Plan. The recommendation we hope you take most seriously is to create a separate Goal for Integrated Pest Management.

**Planning that matches the climate crisis is vital. This is not clear enough in the Background Report.** The most recent report of the Intergovernmental Panel on Climate Change (IPCC) states that the climate problem points first to what we do on the land. The USDA Economic Research Service reported on the impacts on prices of food, fiber and energy, and agricultural incomes, as well as the environment. "How farmers respond, or adapt—possibly mediated by policy and technology changes—will ultimately determine the impact of these altered growing conditions on production, natural resources, and food security" Report No ERR-266 "Climate Change and Agricultural Risk Management Into the 21st Century" projects an increase in the cost of the Federal Crop Insurance Program due to greater insured value and yield variability resulting from climate change.

I75-1



## FOOD SECURITY

**Lack of secure food system nationally affects local already extreme insecurity.** The Union of Concerned Scientists reported in March 2019 that the already highly degraded industrial model of US agriculture—“a model that neglects soil, reduces diversity, and relies too heavily on fertilizers and pesticides”—makes US farms even more vulnerable to the impacts of climate change. Ventura County depends on the rest of the nation and other countries for 85% of its food supply. Our reliance on international markets and international trade leaves our local economy vulnerable to disruptions such as we must anticipate with the Covid-19 coronavirus.

We need to accelerate localizing our food supply as the focus for food security. It would help to delete the false narrative in Goal 8.4 that local farmers are feeding the local people. If there is no food coming or going, farms are not going to be a resource, which is ridiculous in a county that can grow such a diversity of crops throughout the year.

Goal AG-4.1 needs to include all agricultural products, not just fresh produce, and real incentives and marketing campaigns will be necessary including benchmarks for increased purchase of local products by institutions. Program B to encourage sales and Program C to identify opportunities to provide local food to county agencies are good, but they will need to be stronger. A more aggressive set of programs will be necessary to promote markets for local agricultural products to achieve the food security goal.

I75-2

It is unacceptable to only “identify opportunities...to the extent feasible” to increase county procurement of local products. Feasibility is a matter of where the County decides to invest. Food security is such a priority goal that the county must invest increasingly year by year in local farmers to stimulate a market signal toward localizing our food supply.

Program F in the EIR is excellent to study and remove barriers to farm stands. The program must specifically aim to help Ventura County farmers sell their products in the county and be able to compete with farm stand operators selling products from the San Joaquin Valley, Mexico and elsewhere. Program G to study the “Farm to Front Door” business model ignores many other possible business models to connect producers and consumers and should be rewritten to be more general.

## RESILIENCE

**Resilience starts with farmers being informed about the climate modeling and adopting practices that increase biodiversity and enrich soil to hold carbon and water.** Ventura County hired scientists to run climate models that show the changes in patterns of rainfall, drought, and extreme weather events and how that is connected to wildfires. The modeling is not found with enough detail in the VC2040 Background Report to help farmers and their advisers and representatives understand what’s ahead and why a shift in mindset about goals and effective policies and programs are needed that mitigate the climate impacts.

The Agricultural Resilience goal has one policy AG-6. 2. The plan implies that resilience can be achieved only by crop selection. Neither the goal nor the policy covers the necessity to build soil and water-holding capacity and penetration, increase biodiversity and improve the watershed to hold storm water onsite. Program O in the EIR (Program N in the Draft Policy) refers to reduced tillage but the entire policy and program should be rewritten to assure development of the full scope of important resilience strategies.

### INCREASING SOIL CARBON

**Carbon sequestration is a moral imperative as well as the centerpiece of resilience.** The draft policy to encourage and support carbon farming is not explicit enough about the contribution farmers can make by focused effort to increase soil carbon for climate mitigation.

The California Air Resources Board is working with agencies at local levels to develop measures as outlined in Scoping Plan update and governor's Executive Order B-30-15 to reduce GHG emissions toward net carbon sequestration by California's agricultural sector. The governor's 2030 targets for GHG emission reductions focus on the role played by farmland and soil in the carbon cycle. Research is being done regarding how much GHG is being emitted and how much can be sequestered by California's agricultural lands. The words "when feasible" should be deleted from Policy AG-5. 5 and Program L and replaced by a policy and program to develop meaningful incentives.

A serious flaw in the state Healthy Soils Program is the refusal to allow applications by farmers that have previously done practices on their farm to increase soil carbon. Farmers learn most from other farmers. Our early adopters should be supported to continue to do on-farm experimentation with multi-pronged and innovative practices that to increase their soil carbon and other benefits. The County should create a program complementary to the state program to support exemplary farmers to expand local experiences with carbon sequestration even though they are disqualified (because they are innovators) from the state Greenhouse Gas Reduction Fund programs.

I75-2  
cont.

### REGENERATIVE AGRICULTURE

***Regenerative practices are essential for farmland preservation as well as resilience and food security, whether or not you use that term.*** The Planning Commission and the Board approved the addition of the word regenerative to the AG-5 goal 'Sustainable Farming and Ranching'. The term does not appear in the draft. Goals inherent in the word regenerative are not covered in the draft policy or programs—***to increase biodiversity and enrich soils to hold more carbon***. Increasing soil carbon and above-ground biomass may be implied by use of the term 'Carbon Farming' but these outcomes should be explicit.

In contrast with regenerative practices, what people understand about sustainable practices does not necessarily include increasing soil carbon and above-ground biomass. The USDA definition of sustainable agriculture: "Make the most efficient use of nonrenewable resources and on-farm resources and integrate, where appropriate, natural biological cycles and controls. Sustain the economic viability of farm operations. Enhance the quality of life for farmers and society as a whole." Organic farming used to require soil as the growing medium, but not any longer. Using the term "truly sustainable" as in the draft goal still does not assure the features of regenerative agriculture encompassing a robust response to climate change

by mitigating greenhouse gas emissions. Prohibiting the use of the word regenerative results in a loss of meaningful guidance for facing today's challenges. It can be made up for in Goal 5 by at least assuring in the policies and programs its key features of increasing biodiversity, enriching soils in ways that progressively increase soil carbon, increasing above-ground biomass, and improving watersheds.

Biodiversity here refers to everything from soil microbes to plant roots in the soil to above-ground cropping to include 1 to 5% planted for beneficial insect habitat, to include as many native plants as possible. Other practices to increase biodiversity are crop rotation, perennial mowed cover crop in orchards, agroforestry, silvopasture, and interplanting multiple species or varieties of crops. Not only does biodiversity enhance biological function, especially that of carbon sequestration and nutrient cycling, and improve resistance to all risks from diseases to floods, it also improves economic stability by spreading economic risk and buffering against pest invasions and extreme weather events.

I75-2  
cont.

### **INORGANIC NITROGEN BASED FERTILIZERS**

**Inorganic nitrogen contributes to greenhouse gas emissions and is often unnecessary when regenerative practices are used.** The energy used to manufacture and transport artificial N and phosphate fertilizers are major contributors to climate change. Research in pasture and cover crops show fertility is achievable with no nitrogen inputs, artificial or biological. The greater the biodiversity the greater the carbon sequestration, nitrogen fixation, and other nutrient cycling. There is misinformation being shared by trusted experts about the potential to increase soil carbon on Ventura County farms. Research shows that all nutrients, including phosphorus, calcium, and sulfur, as well as nitrogen, are available in soils and can be mobilized by growing the microbial diversity via the "liquid carbon pathway" fed by photosynthesis by a diversity of growing plants. Research and demonstration of this kind should be carried out, particularly in our orchards, vineyards, and other perennial crops.

It is unacceptable as proposed in Policy AG-5.1 to simply "encourage reduced fertilizer use and use of compost and enhanced efficiency fertilizers." This policy disregards the most cost-effective Best Management Practices to reduce inorganic nitrogen fertilizer use by cover cropping and crop rotation. The climate mitigation potential as well as the feasibility and the co-benefits associated with avoiding inorganic nitrogen suggest that AG-5.1 should be changed from 'shall encourage' to 'shall study, monitor and set benchmarks' for reducing use of inorganic nitrogen while encouraging the organic fertility approaches described on page 9-32 of the Background Report. Goals for reduction must show up in the GHG inventory. The inventory reflects no anticipated decrease in use of artificial nitrogen fertilizer for the next 20 years, one of many errors and omissions in the inventory.

I75-3

### **COVER CROPS AND LOW- AND NO-TILL**

**Cover cropping is a Best Management Practice for fertility that should be included in Program H in the EIR.** Keeping soil covered prevents loss of soils to wind and water erosion. The benefits for food security, resilience and farmland conservation and preservation are so great that Program H should include incentives for cover cropping and crop rotation that builds soil nitrogen to avoid the need for inorganic nitrogen inputs, build soil carbon, hold water, and protect from erosion.

I75-4

A program for equipment sharing would help achieve adoption of low- and no-till farming. Farmers need the right size and adaptation of no-till seeders and transplanters for planting into cover crops, flammers and roller crimpers, flails and/or subsurface cutting equipment to be able to keep the ground covered, lay cover crops down, and enable planting and cultivation with minimum soil disturbance. The program should employ a fabricator to work with growers to modify or build the equipment needed to carry out low- and no-till farming.

## COMPOST

**Application of compost and compost tea or extract can kickstart increases in soil carbon.** This is what is commonly promoted as 'carbon farming'. The County must maximize the availability and use of compost. The County must go beyond the incentives provided by the state Healthy Soils Program and incentivize effective use of compost teas and extracts as well as compost, because when composting is fully implemented there will not be enough compost to support Ventura County land management. There are proven benefits from inoculations with extracts and teas that have not met the state's accountability criteria for the Greenhouse Gas Reduction Fund grants.

The Background Report should include a description of the expanding expertise and experiences in the County to scale small-scale on-site composting, the application of extracts and brewing of custom blends of compost tea. The community organizing by the Center for Regenerative Agriculture in cooperation with Patagonia employees and Once Upon a Watershed is scalable. A plan for composting food waste should include studying the barriers and maximizing areawide and on-site composting for use by farmers and landscapers. We recommend fast-tracking project approvals and county investment in operations to compost food waste and municipal waste. Compost might be used as a reward for those who follow regenerative farm plans that increase soil carbon.

I75-4  
cont.

## AGRICULTURAL LAND PROTECTION AND PRESERVATION

**Agricultural land protection and preservation depends on development of regenerative farming practices.** Some "right-to-farm" issues are often moot when regenerative practices are employed. There may still be noise and odor impacts, but pesticides and dust need not be issues. Food safety issues can be managed. Practices that will best assure financially successful farms are not necessarily incompatible with urban areas or existing communities. It may be an economic advantage to develop compatibility with other land uses because, in the end, landowners have more good financial options when they care for their land using compatible regenerative practices. Otherwise, there is little chance that farmland could be dedicated to agricultural conservation easements. Farmland can only be worth conserving if the land manager increases the biodiversity, enriches the soil to hold carbon and improves the watershed. Furthermore, the most financially stable and potentially profitable farms will increasingly be connected to local markets and be patronized by a community that values their use of organic and/or regenerative practices.

As the most certain way to preserve agricultural land, the General Plan should create baselines and goals and targets for carbon sequestration that is an indicator of the value of farmland, with its co-benefits of preventing pest and disease, erosion and nutrient and water loss prevention, and increasing resilience to drought, flooding and resilience to temperature

extremes. If the “right-to-farm” implies that Prime and Important Farmland soil is laid bare, compacted and/or regularly tilled, and exposed to toxic inputs including herbicides, synthetic fertilizer causing it to be devoid of life and subject to erosion and crop failure under extreme weather conditions, then there is no land preservation policy able to save it from being abandoned or sold for development.

#### **INTEGRATED PEST MANAGEMENT**

**Integrated Pest Management (IPM) policy must be the only pest management policy in the plan and it must be promoted as a system for all sectors, not just a set of practices for farmers.** As the University of California definition states, IPM aims to prevent pests and diseases. This is achieved first by healthy plants ideally and then with selection of plants resistant to pests and diseases. Next, healthy plants are achieved by enhanced soil and resulting water holding capacity and fertility and cultural practices tailored to the site, the crop and the seasonal conditions, including habitat enhancement and biodiversity to support naturally occurring beneficial insects and pollinators. IPM is characterized by careful monitoring and avoiding toxic pesticides that disrupt the natural enemy complex that keeps pests below a level that creates economic damage.

IPM is often viewed as a substitution of a more toxic pesticide with a less toxic pesticide—a less disruptive silver bullet. This ignores the foremost feature of IPM which is that it is a system that aims to **prevent** pests and disease. The Agriculture Commission does not currently employ expertise in ecologically systems-based IPM in order to be able to have discussion with applicants about alternatives to pesticides. They have said that they do not see it as their role to advise applicants on alternatives. In our experience it does not appear that applicants are motivated to seriously consider alternatives to toxic pesticides. If the Ag Commission accepts without question whatever shows in the “Alternatives Considered” box on the application form and low risk alternatives are not considered, the process is of no benefit to the public.

One of the barriers to consideration of alternatives is that the most effective alternatives, such as biological control, require earlier lead times and more proactive and multi-pronged strategies than the use of pesticides. The best alternatives to pesticides require attention to soil building and crop plans that forecast insect movement in the farmscape, in other words systems thinking rather than the common replacement of an organic pesticide for higher risk pesticide.

The Background Report and the EIR omit reference to state legal requirements for the consideration of alternatives and cumulative effects before an applicant is approved to use a regulated pesticide. Pest Control Advisers who represent pesticide companies often do not understand or recommend IPM approaches to pest management. They have a conflict of interest, being paid a commission when they sell pesticides.

Pest Control Advisers who do not represent pesticide companies also are not materially incentivized to recommend many IPM practices because it usually requires more advanced agroecological knowledge and experience, and involves more frequent scouting, uncertainty, risk, and complex judgments about economic thresholds. Everything in the existing culture and incentives related to pest management advising and pesticide use applications favors the decision to use pesticides and conclude that there are no alternatives. There is no

I75-4  
cont.

enforcement of the law over this decision-making process. These existing conditions highlight the need for the Agriculture Commission and the Cooperative Extension to somehow create learning opportunities about ecologically based Integrated Pest Management as a systems approach prioritizing pest and disease prevention.

Policy and programs are needed that lead the entire community of regulators, consultants, farmers and consumers along the Roadmap for Integrated Pest Management in the shift of mindset about pest management described on page 11 that flips the risks and incentives to favor the most effective alternatives that keep pests and disease below economic thresholds.

While developing protocols for guidance, discussion, and documentation of the consideration of alternatives within the definition of IPM, at the very minimum there must be a framework for analyzing cumulative effects of more than one aerial or vapor-borne pesticide and the effects from pesticides used in a non-attainment area for other air pollutants. There is at least one scientifically documented case study in the county of the failure to consider cumulative effects and other cases where studies are urgently needed as a result of the calendar spraying for Asian citrus psyllid.

I75-4  
cont.

The policy and programs relating IPM to the general public should also look deeper to support the shift in mindset described in the Roadmap to IPM. It is just scraping the surface “to provide information on IPM and agriculture produces and practices” as stated in Policy AG 3.3. IPM policies should be placed under a separate new goal with policies aligned with the state Roadmap for Integrated Pest Management recommendations. See at [https://www.cdpr.ca.gov/docs/pestmgmt/ipm\\_roadmap.pdf](https://www.cdpr.ca.gov/docs/pestmgmt/ipm_roadmap.pdf)

Excerpting ideas from pages 16 and 17 of the Roadmap, for example:

- a. **Hire an IPM coordinator and revive the county’s IPM Committee** with county public participation to promoting IPM practices
- b. **Drive demand for IPM in the value chain** by coordinating efforts with key organizations to link IPM and regenerative and sustainable agriculture initiatives with retail brands and raise awareness among commodities and allied groups such as packers and shippers, retailers, and trade partners

- c. **Participate in speeding up IPM innovation** through innovation hubs and on-farm research of ecologically based preventive strategies
- d. **Invest in trusted messengers** by collaborating with community-based organizations to facilitate field worker training on IPM and highlight ways they can be IPM leaders in the community as partners and storytellers, creating opportunities through environmental justice to address pest and pesticide issues for low-income households and neighborhoods, and expanding educational offerings in Spanish and Mixtec with culturally appropriate materials
- e. **Profit from frontline knowledge of field workers and municipal applicators** to improve early detection of pests, recommend lower risk approaches, and use safe practices in the workplace
- f. **Strengthen the public's capacity to understand** pests, pesticides and IPM by featuring IPM in training programs including STEM in schools, community colleges, 4-H, Master Gardeners, senior citizens' groups and others, teach consumers about pest prevention using IPM examples, promote positive public announcements with using IPM in core messages, and include identification of pesticide poisoning in continuing education of health professionals
- g. **Make practitioners more effective voices** for IPM by training frontline workers in agriculture, landscape and structural IPM
- h. **Leverage non-traditional resources** for IPM by working with Chumash and Mexican indigenous leaders to learn and expand the community's awareness about native wisdom that relates to IPM
- i. **Strengthen capacity of practitioners** to use more true IPM by supporting on-farm demonstrations and farmer-to-farmer field days and establishing training in non-agricultural settings e.g., restaurant and assisted-living workers, landscapers, etc.
- j. **Help redesign the retail IPM process** with programs to support retailers to educate consumers about responsible use of pesticides, limiting availability of high risk pesticides in the marketplace to trained and licensed professionals, and creating partnerships with local organizations such as Ocean Friendly Gardens to provide education and resources for consumers. An excellent example is the Our Water; Our World program.

I75-4  
cont.

Sincerely,

Jan Dietrick, Master of Public Health, and  
 Ron Whitehurst, Licensed Pest Control Advisor  
 Co-Owners of Rincon-Vitova Insectaries, Inc.  
 108 Orchard Dr  
 Ventura, CA 93001  
 805-746-5365

<b>Letter I75</b>	<b>Jan Dietrick and Ron Whitehurst</b> February 27, 2020
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I75-1 The comments regarding the draft EIR analysis of the 2040 General Plan Agriculture Element and the need to include climate change in planning are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

Regarding the comment that the Background Report does not clearly convey the commenter's statement that "(p)lanning that matches the climate crisis is vital," the draft EIR references Chapter 12 of the Background Report, which provides an overview of climate change science, sources of greenhouse gas (GHG) emissions in the county, and the regulatory setting for GHG emissions (Section 12.1, starting at page 12-1) and describes the anticipated impacts of climate change in the county (Section 12.2, starting at page 12-19). Section 12.2 addresses the impacts of climate change on agriculture in the county, including from increased temperature, changes in precipitation patterns, and sea level rise. Also refer to Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR, including discussion on the level of detail and scale of information.

Additionally, the comment states that five programs are added to the EIR, but are not in the draft 2040 General Plan. These five programs are not identified and no further specifics are provided in the comment. Thus, no further response can be provided.

Regarding the comment that the County should create a separate goal for Integrated Pest Management, this comment addresses the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

I75-2 The comment addresses additional topics including food security, resilience strategies involving agriculture, carbon sequestration on agricultural lands, regenerative agricultural practices, and use of fertilizers that the commenter requests be addressed in the 2040 General Plan. As explained in the draft EIR, the 2040 General Plan includes eight implementation programs that would support reduced greenhouse gas (GHG) emissions from the agricultural uses in the county, including programs that reduce use of inorganic fertilizers, encourage farmers to adopt organic growing techniques, encourage the capture and storage of concentrated carbon in soils from farm waste and woody biomass; and improve soil health and reduce the need to apply inorganic fertilizers (pages 4.8-39 to 4.8-43). This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.



- 175-3      The comment suggests that the language of Policy AG-5.1 be amended and that the GHG reduction benefits of the amended policy be represented in the GHG inventory. Contrary to the commenter's assertion, the GHG inventory does assume reduced use of inorganic nitrogen fertilizer by 2030. Table 4.8-5 (page 4.8-39) of the draft EIR provides a numerical estimate of the anticipated GHG reductions association with Program AG-H: Nutrient Management Plans by 2030. Based on the analysis provided in Appendix D of the draft EIR, the County assumed that 25 percent of inorganic nitrogen fertilizer would be replaced by locally sourced organic waste resulting in 33,830 metric tons of carbon dioxide equivalent by 2030. The GHG inventory was conducted using the most current and available data, reasonable assumption predicated upon facts, and expert opinion supported by facts consistent with State CEQA Guidelines, Section 15384. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- 175-4      The comment requests that additional topics be addressed in the 2040 General Plan including cover cropping, crop rotation, low- and no-till farming, carbon farming, regenerative agricultural practices, and integrated pest management. Note that the 2040 General Plan includes implementation programs that encourage and facilitate carbon farming (Implementation Program AG-L) and provide subsidies for producing resilient crops (Implementation Program AG-O). Also refer to response to comment 175-2. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- Additionally, the comment states that the Background Report and EIR omit reference to state legal requirements for the consideration of alternatives and cumulative effects before an applicant is approved to use a regulated pesticide. It is not clear to what legal requirements the comment refers, and no specifics are provided in the comment. The draft EIR contains an analysis of alternatives to the project and cumulative effects of the project, as required by the California Environmental Quality Act (see Chapters 6, "Alternatives," and 5, "Cumulative Impacts," respectively). No further response to this comment can be provided.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Sunday, February 9, 2020 7:03 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
176**

**You have a NEW Comment**

**Name:**  
Jeannette Welling  
**Contact Information:**  
2450 Pleasant Way Unit Gm Thousand Oaks, CA 91362  
**Comment On:**  
Draft Environmental Impact Report

**Your Comment:**

Buffers should be increased from the currently proposed 1,500 feet to 2,500 feet.

Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking. The DEIR would allow flaring if conveyance by pipeline is deemed infeasible, creating another loophole that could allow oil producers to simply claim that the cost is too high and continue with business as usual.

Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions.

The county should adopt the strongest possible measures to ensure that greenhouse gas emissions are curbed to protect air quality and to ensure a safe, sustainable future for all county residents.

I 176-1

176-2

176-3

**Letter  
176**

**Jeannette Welling**  
February 9, 2020

- 176-1 Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.
- 176-2 Refer to Master Response MR-4, Section MR-4.G Pipeline Requirements, regarding the findings and conclusions related to pipelines in oil and gas operations.
- 176-3 The comment requests that the County revise 2040 General Plan policies to achieve measurable, enforceable reductions in greenhouse gas (GHG) emissions and adopt the strongest possible measures. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.

106 MAR 12 2021

**VIA ELECTRONIC MAIL:** [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

**Letter  
177**

February 25, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I77-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I77-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I77-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

I77-4

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I77-4  
cont

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I77-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I77-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I77-7

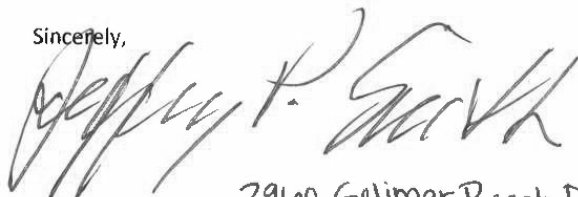
In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I77-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I77-9

Sincerely,

  
2960 Solimar Beach Drive  
Ventura, CA 93001

<b>Letter I77</b>	<b>Jeffery P Smith</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I77-1          Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I77-2          Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I77-3          Refer to response to comment I4-3 regarding water availability and cost.
- I77-4          Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I77-5          Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I77-6          See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I77-7          Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I77-8          The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I77-9          Refer to response to comment I4-9 regarding adequacy of the draft EIR and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Jenn Foster <jenniferfoster7317@yahoo.com>  
**Sent:** Thursday, February 27, 2020 12:45 PM  
**To:** General Plan Update  
**Subject:** General Plan 2020 Updates

**Letter  
178**

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello,

I would urge the County to include how the agency would establish a "preponderance of evidence that the resource is not archaeologically or culturally significant." How would this be done, by whom would it be done, and could any decisions be appealed?

The number of archaeological sites in Ventura County is decreasing at a rapid rate and the definition of archaeological significance should be revised, "that all Native American archaeological sites, should be considered significant since the prehistoric identity of the Indigenous groups is tied solely to archaeological evidence." Loss of any sites would irrevocably result in loss of significant portions of their culture.

I 178-1

Thank you for your consideration.

**Letter  
178**

**Jenn Foster**  
February 27, 2020

This comment letter repeats many of the same comments provided in Letter O30. The response below provides cross references to the portions of Letter O30 where responses to the same comments have already been provided.

178-1      The comment inquires as to how the County would "establish a preponderance of evidence" that an archaeological or cultural resource is significant, asserts that archaeological sites in Ventura County are "decreasing at a rapid rate" and suggests a revised definition of "archaeological significance." Refer to response to comment O30-1 for discussion of these issues.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 26, 2020 8:26 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I79**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**You have a NEW Comment**

**Name:**  
Jennifer Johnson  
**Contact Information:**  
Jstrong12712@gmail.com

**Comment On:**  
Climate action plan

**Your Comment:**  
we need a Climate Action Plan with measurable targets and outcomes!

The current draft General Plan won't help Ventura County meet its climate goals. The policies are not measurable or enforceable, and are not sufficient to drive the kind of change necessary to meet greenhouse gas reduction targets. The County needs to step up, and time is running out to address the climate crisis.

I79-1

<b>Letter I79</b>	<b>Jennifer Johnson</b> February 26, 2020
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I79-1      This comment expresses concerns about the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Also, refer to Master Response MR-1 for information pertaining to greenhouse gas reduction planning concerns.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 19, 2020 4:40 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I80**

**You have a NEW Comment**

**Name:**

Jim Whitney

**Contact Information:**

jim.whitney@yahoo.com

**Comment On:**

the draft environmental impact report.

**Your Comment:**

The buffers for locating oil and gas facilities a safe distance from schools and homes are inadequate. Studies show adverse health impacts from oil and gas facilities at distances of at least half a mile. Buffers should be increased from the current proposal of 1,500 feet to 2,500 feet.

I80-1

**Letter  
I80**

**Jim Whitney**  
February 19, 2020

I80-1

Refer to Master Response MR-4, Section MR-4.H Buffers (Setback) regarding the findings and conclusions related to (buffers) setbacks in oil and gas operations.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 19, 2020 4:45 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I81**

**You have a NEW Comment**

**Name:**

Jim Whitney

**Contact Information:**

jim.whitney@yahoo.com

**Comment On:**

the draft environmental impact report.

**Your Comment:**

Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.

I81-1

**Letter  
I81**

**Jim Whitney**  
February 19, 2020

I81-1

Refer to Master Response MR-4, Section MR-4.F Flaring regarding the findings and conclusions related to flaring in oil and gas operations.



**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 19, 2020 4:58 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I82**

**You have a NEW Comment**

**Name:**  
Jim Whitney  
**Contact Information:**  
jim.whitney@yahoo.com

**Comment On:**  
the draft environmental impact report.

**Your Comment:**

Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions.  
 /Users/Blackfoot/Desktop/Screen Shot 2020-02-19 at 4.53.21 PM.png

I82-1

**Letter  
I82**

**Jim Whitney**  
February 19, 2020

I82-1

The comment requests revision of policies in the 2040 General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions. The 2040 General Plan does include measurable targets for greenhouse gas reductions for 2030, 2040, and 2050 that are aligned with the State's legislative greenhouse gas reduction targets and other reduction goals (page 4.8-6). Refer to Master Response MR-1 for further discussion.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 19, 2020 5:02 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I83**

**You have a NEW Comment**

**Name:**  
Jim Whitney  
**Contact Information:**  
jim.whitney@yahoo.com

**Comment On:**  
the draft environmental impact report.

**Your Comment:**

Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

I83-1

**Letter  
I83**

**Jim Whitney**  
February 19, 2020

I83-1

Refer to Master Response MR-4, Section MR-4.G Pipeline Requirements, regarding the findings and conclusions related to pipelines in oil and gas operations.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Wednesday, February 26, 2020 10:50 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I84**

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**You have a NEW Comment**

**Name:**  
Jimmy Young  
**Contact Information:**  
805.570.9002  
**Comment On:**  
Climate Action Plan  
**Your Comment:**

Please, please do your best to create a master plan with strong environmental vision and leadership. Please give it measurable parameters and TEATH! Please hold all poluters accoubtable and lead our coubty forward. I I84-1

**Letter  
I84**

**Jimmy Young**  
February 26, 2020

I84-1

This comment expresses concerns about the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

The 2040 General Plan includes measurable targets for greenhouse gas reductions for 2030, 2040, and 2050 that are aligned with the State's legislative greenhouse gas reduction targets and other reduction goals (page 4.8-6). Refer to Master Response MR-1 for further discussion.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Monday, February 10, 2020 8:09 AM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
185**

## You have a NEW Comment

**Name:**  
John Brooks  
**Contact Information:**  
None  
**Comment On:**  
Draft EIR

### Your Comment:

The Climate Action Plan isn't good enough.  
 Ventura County needs a Climate Action Plan with measurable targets and outcomes, as a separate document.  
 Policies set in the GenPlan are not measurable or enforceable. Language used in the plan, such as policies that "encourage" and "support" action, are not sufficient to drive the kind of change necessary to meet greenhouse gas reduction targets.  
 I am calling for a separate Climate Action Plan to fill the gaps in the draft General Plan: The county decided not to have a separate Climate element of the General Plan, and instead integrated climate-related policies into the other elements, such as "Land Use" and "Housing." Climate policies are included among these different sections, and compiled in Appendix B of the Plan. Climate was not the primary focus or concern, and these groups lacked the expertise to put forward adequate, science-backed climate policy to guide the next 20 years.

I85-1

**Bigger Buffer Requirements**  
 The current plan allows for oil and gas facilities to be located too close to schools and homes.  
 The current draft plan sets a 1500 ft minimum between oil & gas facilities and homes and schools. This is completely inadequate. The negative health impacts of emissions can be seen as much as a mile away from facilities. We are demanding a minimum 2500 ft. (~half a mile) distance from schools and homes for new oil & gas projects.

I85-2

**We must Stop Trucking Oil**  
 All newly permitted oil wells should be required to transport oil & wastewater via pipelines, not trucks.  
 Most of the oil and wastewater produced from drilling is transported by trucks. These trucks go through or near our neighborhoods carrying hazardous materials, emitting toxic air pollution, and contributing significantly to the addition of greenhouse gases. The current plan protects oil companies by giving them the loophole to default to additional trucking, instead of installing pipelines if oil companies claim the cost of pipeline connection is too high.

I85-3

**The wasteful Flares must stop**  
 I am calling for no new flares in Ventura County.  
 Flares waste a finite natural resource that can be used for energy production. Venting and flaring release toxic gases and powerful climate pollutants like methane into the atmosphere. Under the proposed general plan oil companies would be allowed to continue venting and flaring without restrictions, if they claim the added cost of treating gas on-site or constructing pipeline connections is too high; this technicality lets oil companies carry on with business as usual. Instead, join us in insisting that flaring and venting in all new oil wells be prohibited, except in cases of emergency or testing purposes.

I85-4

Thank you

<b>Letter I85</b>	<b>John Brooks</b> February 10, 2020
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- I85-1      The comment suggests that a Climate Action Plan should be separate from the 2040 General Plan and should include stronger policy language. The policies and programs to reduce greenhouse gas emissions are not made less effective or enforceable by virtue of incorporation into the 2040 General Plan. Refer to Master Response MR-1 for further discussion.
- This comment expresses concerns about 2040 General Plan policies and programs to reduce GHG emissions and is not related to the adequacy of the draft EIR. Therefore, no further response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I85-2      Refer to Master Response MR-4, Section MR-4.H Buffers (Setback), regarding the findings and conclusions related to buffers (setbacks) in oil and gas operations.
- I85-3      Refer to Master Response MR-4, Section MR-4.G Pipeline Requirements, regarding the findings and conclusions related to pipelines in oil and gas operations.
- I85-4      Refer to Master Response MR-4, Section MR-4.F Flaring, regarding the findings and conclusions related to flaring in oil and gas operations.

**From:** John Brooks <johnbrooks69@gmail.com>  
**Sent:** Monday, February 17, 2020 1:01 PM  
**To:** General Plan Update  
**Subject:** One more thing

**Letter  
I86**

This preface by Oxnard resident Steve Nash sums up the feelings of many that the EIR is not sufficient:  
 "The entire assumption of a General Plan and its supporting documentation is to have a forward-looking plan to deal with land use, potential significant impacts and their mitigation measures within a geographical area.

It is my belief, and the belief of many others, that climate disruption caused by greenhouse gas emissions is the primary concern that has to be addressed in this type of document. Any plan that attempts to provide a framework for mitigating significant impacts that does not place climate change at the very forefront of significant impacts is a deeply flawed document and doomed to fulfill its "raison d'etre" which, ultimately, is to secure a safe and prosperous future for the residents and the environment under its jurisdiction."

I86-1

Get busy formulating a real climate action plan!

John Brooks  
 Oak View

**Letter  
I86**

**John Brooks**  
 February 17, 2020

I86-1

The comment states that "climate disruption caused by greenhouse gas emissions is the primary concern that has to be addressed" in the 2040 General Plan, as well as the opinion that failing to do so would result in a "deeply flawed document." The 2040 General Plan addresses climate change by integrating climate change policies and/or implementation programs into every element of the plan. Refer to Master Response MR-1 for additional discussion.

**From:** John Brooks <johnbrooks69@gmail.com>  
**Sent:** Wednesday, February 26, 2020 9:23 AM  
**To:** Curtis, Susan; General Plan Update  
**Subject:** Comments on Draft EIR

Letter  
187

Dear Ventura County-

These comments written by Steve Nash and used with his permission are so wonderfully specific to the concerns that I have over the lack of concrete climate action that I am presenting them here as ideas I share.

I 187-1

Ventura County Resource Management Agency, Planning Division

Attn: Susan Curtis, Manager, General Plan Update

Section 800 S. Victoria Ave., L #1740

Ventura, CA 93009-1740

The entire assumption of a General Plan and its supporting documentation is to have a forward-looking plan to deal with land use, potential significant impacts and their mitigation measures within a geographical area.

It is my belief, and the belief of many others, that climate disruption caused by greenhouse gas emissions is the primary concern that has to be addressed in this type of document. Any plan that attempts to provide a framework for mitigating significant impacts that does not place climate change at the very forefront of significant impacts is a deeply flawed document and is doomed to fulfill its "raison d'etre" which, ultimately, is to secure a safe and prosperous future for the residents and protect the physical environment under its jurisdiction.

The corrective action is to acknowledge the primacy of climate change and the devastating impacts that will be most severely felt in Ventura County. Climate change is caused by fossil fuel production and consumption. We must do our part to reduce oil production through thoughtful, rigorous policy to phase it out. All Goals and Policies incorporated within a General Plan must have annual quantifiable metrics and measurables that lead to a complete cessation of hydrocarbon extraction practices within the county and the elimination of hydrocarbon usage by a date certain.

Pg. 4.3-7, Policy PFS-2.5: County Employee Trip Reduction. The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.

> What is the goal and how does the County plan on achieving it and in what time frame?

Pg. 4.3-8, Policy PFS-2.6: County Alternative Fuel Vehicle Purchases. The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce greenhouse gas emissions where economically feasible.

> What is the goal and how does the County plan on achieving it and in what time frame?

Pg. 4.3-8, Policy COS-8.1: Reduce Reliance on Fossil Fuels. The County shall promote the development and use of renewable energy sources (e.g., solar, thermal, wind, tidal, bioenergy) to reduce dependency on petroleum-based energy sources.

> What is the goal and how does the County plan on achieving it and in what time frame?

Pg. 4.3-8, Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings. The County shall support the transition to zero net energy and zero net carbon buildings, including the electrification of new buildings.

> What is the goal and how does the County plan on achieving it and in what time frame?

Pg. 4.3-9, Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development. The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas emissions.

> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame?

187-2

Pg. 4.3-10, Policy HAZ-10.7: Fuel Efficient County Vehicles. When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, include the use of zero emission vehicles when feasible.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame?

Pg. 4.3-10, Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce stand-by charges.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame?

I87-2  
cont.

Pg. 4.6-6, For the purpose of this Draft EIR, implementation of the impact on energy resources would be significant if implementation of the 2040 General Plan would: Result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation that would cause a potentially significant effect on the environment. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.  
> Include "Not meet a 100% renewable energy economy by 2045."

I87-3

Pg. 4.6-7, Policy LU-11.4: Sustainable Technologies. The County shall encourage discretionary development on commercial- and industrial- designated land to incorporate sustainable technologies, including energy- and water-efficient practices and low- or zero-carbon practices.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame?

Pg. 4.6-8, Policy CTM-2.12: Countywide Bicycle Lane and Trail System. The County shall coordinate with the cities in the county and Ventura County Transportation Commission (VCTC) to plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools including colleges and universities, commercial/retail, employment centers, health care service facilities, public transportation, and other points of interest.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame?

Pg. 4.6-13, Policy PFS-7.6: Smart Grid Development. The County shall work with utility providers to implement smart grid technologies as part of new developments and infrastructure projects.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame? All large projects will incorporate a micro-grid with solar and battery storage technology.

I87-4

Pg. 4.6-13, Policy COS-7.7: Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.  
> All produced water shall be treated on-site so as not unfairly burden disadvantaged and communities of color that have had to accept this toxic waste in the past.

Pg. 4.6-13, Policy COS-8.1: Reduce Reliance on Fossil Fuels. The County shall promote the development and use of renewable energy resources (e.g., solar, thermal, wind, tidal, bioenergy, hydroelectricity) to reduce dependency on petroleum-based energy sources.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

Pg. 4.6-15, Implementation Program R: Performance-Based Building Code for Green Building. The County shall update the Building Code to establish performance-based standards that incentivize green building techniques.  
> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

Pg. 4.6-17, Policy WR-3.1: Non-Potable Water Use. The County shall encourage the use of nonpotable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations.

> Currently meaningless as written. What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

I87-4  
cont.

Pg. 4.8-1, Executive Order (EO) B-55-18, which calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter.

> To provide consistency with the time frame of the General Plan, Ventura County should be carbon neutral by 2040, if not sooner.

Pg. 4.8-11, For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant GHG emissions impact if it would: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs.

> If there is no actual program to measure GHG from all sources, nor scheduled, implementable reduction protocols that result in carbon neutrality by a date certain then this is meaningless. What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

I87-5

Pg. 4.8-12, Implementation Program P: Annual General Plan Implementation Review. The County shall review the General Plan annually, focusing on the status and progress of program implementation. The County shall prepare a report to the Board of Supervisors summarizing the status of implementation programs and any recommendations for General Plan amendments.

> What are the metrics and measurables and in what time frame and by what date-certain will Program P be fully realized?

Pg. 4.8-22, Implementation Program K: Coordination on Large Onsite Wastewater Treatment Systems Repairs. The County shall coordinate with the Los Angeles Regional Water Quality Control Board to address compliance and repair issues for large onsite wastewater treatment systems (over 5,000 gallons) and package treatment systems.

> Wastewater infrastructure is a source of GHG emissions, especially methane. How will these emissions be measured and mitigated/reduced/eliminated?

Pg. 4.8-23, Policy COS-7.2: Oil Well Distance Criteria. The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school.

> Why the discrepancy? Make the distance a uniform 2,500 feet.

I87-6

Pg. 4.8-23, Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings. The County shall support the transition to zero net energy and zero net carbon buildings, including electrification of new buildings.

> What is the goal and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

Pg. 4.8-24, Policy COS-10.2: Community Greenhouse Gas Emissions Reduction Target for 2030. The County shall achieve a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.

> What are the annual goals and how does the County plan on achieving it via metrics and measurables and in what time frame and by what date-certain?

Pg. 4.8-27, Implementation Program U: Solar Canopies in Non-Residential Projects. The County shall amend the County's Coastal and Non-Coastal Zoning Ordinances to require parking lots for new non-residential construction projects, with floor area of greater than 50,000 square feet, to include solar canopies.

> Eliminate the floor area requirement and go with a percentage such as 90% of the parking area shall have canopy solar.



Pg. 4.8-27/28, Implementation Program DD: Budget and Staffing Plan for CAP Implementation. The CEO shall, within six months from the adoption of the General Plan Update and Climate Action Plan, present to the Board of Supervisors a proposed budget and staffing plan Greenhouse Gas Emissions Ventura County 4.8-28 2040 General Plan Draft Environmental Impact Report (including qualified technical consultants) to implement the Climate Action Plan, and shall update the budget and staffing plan each year.

> Include a citizen advisory committee, also.

Pg. 4.8-32, Implementation Program Q: Standards for Solar Photovoltaic (PV) Carports in County Lots. The County shall establish standards for inclusion of solar PV carports in County-owned parking lots.

> Implement a 90% coverage by canopy solar by date certain.

Pg. 4.8-32, Include the following, "Work with the Clean Power Alliance to plan, permit and build all possible opportunities to implement the CPA's "Local Programs" mandate."

Pg. 4.8-33, Policy AG-5. 5: Carbon Farming Practices. The County shall encourage and support the efforts of resource conservation districts, farmers, and other stakeholders to expand carbon farming practices, such as reduced tilling, cover-cropping, composting, biochar, and other activities that both reduce GHG emissions and increase carbon sequestration and storage, when feasible.

> Include "regenerative farming".

Pg. 5-11, 5.2.8 Greenhouse Gas Emissions, Thus, the 2040 General Plan's incremental contribution to cumulatively significant climate change effects would be cumulatively considerable.

> Unacceptable conclusion.

The Los Angeles Sustainability Plan, aimed at meeting the goals of the Paris Climate Agreement, has clear and bold goals: "By eliminating fossil fuel production in the county, including drilling, production and refining, the county will protect its residents from harmful local pollution that inequitably burdens low-income communities and communities of color." We should demand no less from our DEIR/General Plan.

Action Needed: The county should adopt the strongest possible measures to ensure that greenhouse gas emissions are curbed to protect air quality and to ensure a safe, sustainable future for all county residents.

Therefore, in my opinion, this DEIR is inadequate, missing disclosure of plan impacts, lacking in meaningful and enforceable policies (e.g., substituting "shall" with "should"), incompletely quantified, and lacking mitigations for cumulative and incremental impacts.

Thank you for your time and consideration.

By Steve Nash

Endorsed by  
John Brooks  
Oak View

I87-6  
cont.

I87-7

<b>Letter I87</b>	<b>John Brooks</b> February 26, 2020
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I87-1 The comments written by Steve Nash (refer to Letter I197) and concerns over the lack of concrete climate action are noted. This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

I87-2 The comment expresses opinions about the importance of climate change and the need to cease oil and gas extraction. See response to I86-1, above, for a discussion of how climate planning is integrated into the 2040 General Plan. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions. Refer to Master Response MR-4 for discussion of the suggestion that the 2040 General Plan require phaseout of petroleum extraction in the unincorporated county.

The comment also cites seven specific 2040 General Plan policies (as identified in Section 4.3, "Air Quality," of the draft EIR) and, for each one, asks about the County's goals, plans to achieve, and anticipated timeframe. These policies are considered qualitatively in the analysis of potential effects on air quality in Section 4.3 of the draft EIR. The impact analysis is not predicated on any assumptions of measurable reductions in air pollutants from these policies.

This comment on policies of the 2040 General Plan is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

I87-3 The comment provides a suggested addition to the energy thresholds of significance in the draft EIR related to achieving a 100 percent renewable energy economy by 2045.

For the purpose of evaluating the potential environmental effects of implementing the 2040 General Plan, the thresholds of significance are based on the County's Initial Study Assessment Guidelines (ISAG), as well as the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and the applicable regulatory standards of the County and federal and state agencies with jurisdiction over the resources at issue. As explained in Section 4.1, "Environmental Impact Analysis," (page 4-1) and described in detail for each resource analysis, "deviation from the ISAG thresholds, which were established by the County to evaluate the impacts of individual projects, was sometimes necessary to appropriately consider the programmatic nature of a general plan for the entire unincorporated area, and to incorporate the 2019 revisions to the Appendix G checklist."

The thresholds of significance used in the draft EIR to evaluate energy-related impacts are described on page 4.6-6. In Impact 4.6-1 (starting at page 4.6-18), the draft EIR analyzes whether implementation of the 2040 General Plan would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or impede State or local plans for renewable energy or energy efficiency. On pages 4.8-21 and 4.8-22, the draft EIR provides analysis demonstrating the implementation of the 2040 General Plan would not conflict with or obstruct State plans for renewable energy and energy efficiency. Note that the State has not adopted any plans defining a 100 percent renewable energy economy or demonstrating how it would be achieved.

The suggested threshold would be consistent with Senate Bill (SB) 100, which is a Statewide renewable portfolio requirement implemented by state agencies including the California Public Utilities Commission, the California Energy Commission, and the California Air Resources Board. With full implementation of SB 100 by the end of 2045, zero-carbon sources would account for 100 percent of the electricity in the California grid. At least 60 percent will be provided through renewable energy resources such as wind and solar. The remaining 40 percent would be provided through a combination of renewable and zero-carbon sources, which are anticipated to include recognized methods like energy storage, as well as new technologies that are yet unknown. SB 100 is a statewide requirement that is imposed upon electricity providers. The draft EIR analysis demonstrates that 2040 General Plan implementation would not conflict with or impede SB 100 (page 4.8-22). No further response to this comment is required and no revisions have made to the draft EIR in response to this comment.

- 187-4      The comment cites specific 2040 General Plan policies (as identified in Section 4.8, “Greenhouse Gas Emissions,” of the draft EIR) and, for each one, asks about the County’s goals, plans to achieve, and anticipated timeframe. The comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Also, refer to Master Response MR-1 for additional discussion of the 2040 General Plan, its policies and programs, and mitigation measures related to GHG emissions reductions.
- 187-5      The comment asserts that the County should be carbon neutral by 2040, to be consistent with Executive Order B-55-18, which calls for the State to achieve carbon neutrality by 2045 and net negative GHG emissions thereafter. The thresholds of significance used in the draft EIR to evaluate GHG-related impacts are described on pages 4.8-7 through 4.8-11, and the basis and methodology for establishing GHG reduction targets in the 2040 General Plan are described in Master Response MR-1.
- 187-6      The comment cites specific 2040 General Plan implementation programs and policies (as identified in Section 4.8, “Greenhouse Gas Emissions,” of the draft EIR) and, for each one, asks about the County’s goals, plans to achieve, and anticipated timeframe; for some policies, the commenter provides suggested revisions. The comment addresses implementation of the 2040 General Plan and

is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Also, refer to Master Response MR-1 for additional discussion of the 2040 General Plan, its policies and programs, and draft EIR mitigation measures related to GHG emissions reductions.

- 187-7      The comment states that the draft EIR's significance conclusion for climate change is unacceptable and requests that the County adopt stronger measures to reduce GHG emissions impacts. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.

**John Brooks**  
**140 Beech Rd**  
**Newbury Park, CA 91320**

**Letter**  
**188**

February 27, 2020

Transmitted via e-mail: [generalplanupdate@ventura.org](mailto:generalplanupdate@ventura.org)

Susan Curtis,  
Ventura County Resource Management Agency,  
Planning Division  
800 S. Victoria Ave  
Ventura, CA 93009

Re: Comments on County General Plan and Climate Action Plan

Dear Ms. Curtis:

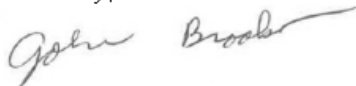
I appreciate the opportunity to review and comment on the County's General Plan and the integrated Climate Action Plan. It is a very significant undertaking and I wanted to recognize that staff has made great strides in incorporating the diversity of interests and often conflicting perspectives.

I have attached comments to this letter and divided them into comments specifically addressing a Policy/Program and an additional more generic set of comments, resources and research that I relied on as part of my evaluation or I was unsure which section or sections to include them in. Hopefully the additional context will assist in the refinement of the GP and CAP.

188-1

There is an overreliance on state legislation as a source of emissions reductions in the early years. Local efforts need to be more robust given the urgency of the issue and the potential that the IPPC targets are not substantive enough given the latest scientific analysis. Please see the CFROG letter from June 5, 2019 for a more comprehensive overview. To avoid redundancy, I am not replicating all the CFROG comments. However, I am including them as part of my comments by reference.

Sincerely,



John Brooks

## Climate Change Resources & Comments

### Specific comments on sections of the CAP

LU-11.4 Change Shall to Require

LU-16.5 Change Shall to Require

LU-18.5 – “encourage stakeholders” and “have opportunity to learn about” is a pretty low bar. Please upgrade to County shall conduct programs/outreach in their neighborhoods or community gatherings and include multi-lingual capabilities as needed to reach out to the Hispanic and Mixteco populations.

PFS-1.2 & 1.3 – The County should adopt a policy of considering the 100-year projections when evaluating infrastructure since these facilities have significant sunk costs and it is significantly cheaper to upgrade when planning a facility versus retrofitting an existing building.

PFS-2.3 State law requires commercial buildings to be zero net energy (ZNE) in 2030. The County should show leadership, by requiring all new buildings to be ZNE and existing buildings to be in substantial compliance if the County is leasing greater than 50% of the building space.

PFS-E – The County procurement policies should be updated to require all suppliers, vendors and consultants to disclose the sustainability of their operations. The County could award as little as one point to this category, however, the requirement to disclose will have a significant effect on the adoption of policies and procedures that are environmentally beneficial. The County could develop a one-page form checklist that they submit with their bids. Alternatively, large corporations can share their corporate sustainability or ISO certifications and smaller ones can show that they follow the [Ventura County Green Business](#) practices if they have already completed those more comprehensive processes.

COS-8.1 – include promotion of microgrids as both a carbon reduction and resiliency measure for PSPS events.

COS-8.9 - Change Shall to Require and have a list of recommended shade trees appropriate for that region and tolerant of parking lot conditions. This could assist with stormwater mitigation measures and help reduce financial impacts to the County from flow into the public ROW.

COS-H – Ensure that the goal is net additional trees beyond replacement of dead/dying trees or mitigation trees for a project. Recommend that preference be given for tree planting in EJ or low-income communities.

COS-M – In addition, oil companies should pay an extraction fee per barrel for an insurance mitigation fund to ensure that abandoned wells and sites owned by bankrupt companies do not become a burden to taxpayers.

COS-Z – These should be online with easily understandable charts or graphs enabling the public to understand the data and compare to the projected savings to determine if individual measures are being met.

I88-2

COS-CC I commend the recommendation to establish a Climate Emergency Council to advise the Board.

COS-DD – A critical component to assist in the development and implementation. An Office of Sustainability should be established within the CEO's office and the primary staffperson in charge of this effort should be a direct report to the CEO recognizing both the critical and cross-cutting nature of this work and ensure the full cooperation of all County offices.

COS-EE - Measures should be incorporated to ensure that projects continue to implement requirements after the project is finished and occupancy is granted or face substantial penalties. For example, if they bypassed one or more measures, they could agree upfront to a penalty of 10x the carbon wasted with the funds going to assist in low-income areas of the county to weatherize or otherwise reduce their carbon footprint.

Haz-1.4 – The County should develop reach fire codes for the urban-wildland interface to minimize both property damage and the danger to emergency responders trying to protect structures in the new fire environment.

Haz-10.7 Change to read that the County will purchase ZEVs, unless they are not readily available in the vehicle class or purpose needed or the lifetime cost of the vehicle including purchase, fuel and maintenance exceeds 15% of the cost of a non-ZEV. The County needs to show leadership and these vehicles are a very public way to showcase the transition to the low-carbon economy.

HAZ-11.6 What provisions will be made to identify and transport those without transportation and the elderly or disabled who cannot afford or do not have access to AC to cooling centers? Will the cooling centers be open 24/7? One of the problems is that the nights are heating up faster than the days so residents may need to stay overnight. Will animals be allowed in these facilities?

I88-2  
cont.

#### **PSPS/Wind Events**

PSPS outages – need to be prepared for 3-7 days of electricity outages. These are not considered emergencies by the Red Cross, so they will not staff shelters. If a substantial part of the county is without power, we will need cooling shelters (with power) which can be a mix of day use only and overnight shelters. The centers will need to have robust electrical charging stations to run oxygen tanks and other medical equipment. Medicines may need to be refrigerated and monitored. Have the shelters been retrofitted with generators or are they wired correctly for three-phase generators? Where will generators be located to quickly deploy especially if routes like the 101 freeway are closed?

A power outage may do the following:

- Disrupt communications, water, and transportation
- Close retail businesses, grocery stores, gas stations, ATMs, banks, and other services
- Cause food spoilage and water contamination
- Prevent use of medical devices and operations or medical/senior center facilities

From [Ready LA County](#)

A spike in generator purchases and rentals by people unfamiliar with their safe operation is likely and may result in carbon monoxide poisoning.

7.13 Wildfire – The County should adopt reach codes for fire.

Although Santa Anas have decreased in frequency and severity of extreme wind events, the Santa Ana window or primary season is moving to Nov-Jan. This could result in more fires in this period, particularly in dry years<sup>1</sup>.

7.13 P – Should also include infrastructure at risk that the County does not control but relies on.

7.13 Does not include anything related to the more intense rains and flooding expected from less frequent, but more intense storms.

In addition, wildfire has profound effects on storm runoff, erosion, and sedimentation in the complex terrain within Ventura County. For several years following a fire, runoff rates can more than double due to fire-driven changes in soil properties that render it water-repellant and reduce infiltration rates (USGS 2005; USGS 2019). Short-duration, high-intensity precipitation under these conditions increases surface runoff that can cause movement of ash, burned vegetation, soil, rocks, and other debris. This material is scoured from steep channels and moved downslope where it may impact communities or infrastructure below as a debris flow.

9.8 G – The County should adopt a policy to establish parcel-based water budgets to prepare for the implementation of the state water efficiency mandates “Making Water Conservation a Way of Life”. This will ensure that parcels that use more than their fair share are targeted for outreach and punitive measures as necessary to comply with the state law.

## 10 Economic Vitality

### EV-4.2 Economic Development Opportunity

California and Ventura County are well-positioned to be leaders in the development and deployment of greenhouse gas (GHG) reduction solutions that will assist in the transition to a low-carbon economy. Because of California’s size and early adoption of significant environmental controls, Cap & Trade, AB 32, and mandatory organics recycling, the state is already a key player in finding sustainable solutions that include cleaner emission vehicles, energy efficient appliances, and green chemistry requirements. These are also the types of jobs and opportunities we need to develop locally to provide opportunities for our youth and to sustain our region.

The aerospace sector was a huge boost to the Southern California region in the 70s. The Bay area has developed the Silicon Valley, and North Carolina has the Research Triangle. What were the key components that enabled these areas to develop into such well-known powerhouses? How can we leverage the transition to a green economy and position Ventura County as a regional Green Innovation Hub?

Next 10 in November 2014, published the Regional Clean Economy Series of five reports highlighting five sectors of the state that are forming and nurturing regional clean economy sectors focused on the “core clean economy.” Next 10 is an independent, nonpartisan organization that focuses on the environment, the economy, and the quality of life for all Californians.

I88-2  
cont.

<sup>1</sup> Ventura\_Climatechange\_Review\_Oakley.pdf slide 28



They define the core clean economy as, *“businesses that provide the cutting-edge products and services that allow the entire economy to transition away from fossil fuels and use natural resources more efficiently.”*

The regions and core clean economy focus for their reports include:

1. Los Angeles and Orange – advanced transportation
2. Sacramento – electric vehicles, building energy efficiency and solar, waste-to-energy
3. San Diego and Imperial – smart grid and biorenewables
4. San Francisco Bay Area – advanced transportation, energy storage, building energy efficiency
5. San Joaquin Valley – water-agriculture, renewable energy

I88-2  
cont.

### General Comments

**Requested Policy** – Each County department should prepare a Climate Action Plan that evaluates their footprint, mitigation measures, risks to their clientele and mitigation or outreach measures that they will adopt. A substantial portion of this may be done by centralized staff. However, the department staff need to understand the issues and incorporate mitigation measures into their routine activities. This could be the Public Works department, the County Health Department. Climate changes will impact their day-to-day operations and they need to start recognizing, planning for and accommodating those changes.

### Economic Related issues

**Requested Policy** - The Pacific Coast Highway in the Malibu region and the 101 between Ventura and Santa Barbara are both vulnerable. Short-term shutdowns would be disruptive. However, if the corridor was closed for multiple months this would significantly impact traffic and may result in substantial economic impacts. Critical infrastructure should be evaluated regardless of ownership and mitigation plans prepared as warranted.

### Article related to Ventura County

Fires, floods and free parking: California's unending fight against climate change – Scott Wilson, Washington Post December 5, 2019

Since 1895, the average temperature in Santa Barbara County has warmed by 4.1 degrees Fahrenheit, according to The Post's analysis. Neighboring Ventura County has heated up even more rapidly. With an average temperature increase of 4.7 degrees Fahrenheit since preindustrial times, Ventura County ranks as the fastest-warming county in the Lower 48 states. [Some climate scientists believe that there is an error in the Post's projections].

I88-2  
cont.

### Public Health

*Climate change has been called “the biggest global health threat of the 21st century” (Costello et al. 2009). In the LA region, the health impacts of climate change are far-reaching, including direct and indirect impacts related to extreme heat, poor air quality, wildfires, infectious diseases, floods and mudslides, mental health concerns, and increasing disparities caused by disproportionate impacts to vulnerable populations. (NOTE: LA Region includes Ventura County in the analysis) ...*

*The number of extreme heat days in southern California is expected to increase considerably by the middle of the century as a result of climate change (pp. 11–12). Extreme heat is one of the most significant health impacts of climate change and already causes more deaths each year in the United States than floods, storms, and lightning combined (Berko et al. 2014). Exposure to extreme heat can cause direct heat-related illness (heat cramps, heat exhaustion, and heat stroke) and death, and can also exacerbate certain existing medical conditions. Heat waves are associated with increases in the number of people seeking emergency medical care for a variety of health conditions, though the magnitude of this effect depends on many factors, including geographic location, demographics, and availability of adaptive strategies such as air conditioning. During California's 2006 heat wave, there were 16,166*

*excess emergency department visits and 1,182 excess hospitalizations across the state, with increases in visits for kidney related diseases, diabetes, and cardiovascular disease (Knowlton et al. 2009)<sup>2</sup>.*

*While all residents are affected to some extent by extreme heat, certain populations are more vulnerable to severe impacts. These include (a) low-income communities and communities of color, which often experience a greater urban heat island effect due to a lack of trees and other vegetation, and which have lower access to air conditioning (Reid et al. 2009a); (b) older adults, young children, people with chronic medical conditions, and people taking certain medications, who are physiologically vulnerable to the effects of heat (Kenny et al. 2010; Reid et al. 2009a; Tsuzuki-Hayakawa, Tochiwara, and Ohnaka 1995); and (c) outdoor workers (Bethel and Harger 2014), people experiencing homelessness (Harlan et al. 2013), and others who spend a significant amount of time outside and are more exposed to extreme heat. Unlike cities that have consistently experienced extreme heat in the past, the housing stock in LA is not designed for extreme heat. Approximately 51% of households in the LA-Long Beach area have central air conditioning (American Housing Survey 2015). While California code requires that landlords provide adequate heating facilities in homes, air conditioning is not a requirement. Moreover, the LA region's affordable housing crisis may prevent many renters from being able to move to air-conditioned homes where they would be less impacted by heat. Access to air-conditioned spaces may be additionally limited by factors such as mobility, vehicle ownership, perceptions of neighborhood safety, and distance to transit. These factors can prevent vulnerable populations from implementing adaptive and health protective strategies, such as getting to cooling centers or other air-conditioned locations.<sup>3</sup>*

*Do we know the percentage of our houses without AC? Although many residents dependent on social security or other limited income may not turn on the AC even if they have it in their homes due to financial concerns it would be a starting point.*

*Climate change may impact mental health through various pathways, including but by no means limited to (a) increases in the frequency and severity of extreme weather events; (b) increasing economic instability; and (c) uncertainty about the future of the planet. Extreme weather events such as fires and floods can have acute mental health impacts. Clear links exist between extreme weather events and anxiety and depression (Kar and Bastia 2006), post-traumatic stress disorder (Neria, Nandi, and Galea 2008; Kar and Bastia 2006), and suicide (Krug et al. 1999).<sup>4</sup>*

*Public transit infrastructure - Transit design can mitigate human exposure to extreme heat (p. 44). Exposure to extreme heat can result in heat-related illnesses such as heat cramps, heat stroke, and heat exhaustion, and can also exacerbate pre-existing conditions. Further, extreme heat may discourage transit use altogether. Environmental exposure results from access and waiting. Transit users from areas with low residential density, limited high capacity roadways, and irregular street networks not located along direct paths between major activity centers, are likely to experience prolonged access and/or waiting times (Fraser and Chester 2017a)... The placement of transit stops impacts how long passengers are exposed to the environment, and, coupled with walking, may leave them at risk for negative heat-*

I88-2  
cont.

<sup>2</sup> Fourth Climate Change Assessment – LA Region pg 21

<sup>3</sup> Fourth Climate Change Assessment – LA Region pg 22

<sup>4</sup> Fourth Climate Change Assessment – LA Region pg 24

*related outcomes. Walking times can vary significantly by age and physical condition. They can increase by up to 30% for the slowest age group (Bohannon and Williams Andrews 2011).<sup>5</sup>*

#### **Human health effects of extreme heat**

Climate change poses a threat to public health. Heat causes more reported deaths per year on average in the United States than any other weather hazard (NOAA, 2017). In addition to the long-recognized health impacts of extreme heat, hospital admissions and emergency room visits, deaths and other adverse health outcomes have been associated with the warm season in California.

In 2006, dramatic increases in many heat-related illnesses and deaths were reported in California following a record-breaking heat wave. During the summer months, large urbanized areas can experience higher temperatures compared to nonurban outlying regions. "Urban heat islands" create health risks both because of the increased temperatures and because of the enhanced formation of air pollutants. Warming temperatures can amplify the transmission of mosquito-borne diseases (such as West Nile Virus) and make conditions more hospitable for invasive species that may transmit diseases.

While difficult to track using indicators, climate change can impact human well-being in many ways, including injuries and fatalities from extreme events, and respiratory stress from poor air quality (Mellilo et al., 2014).<sup>6</sup>

Climate Change is a Health Emergency – Coalition of health organizations

Yale Climate Connections on Health

Information on the health effects of climate change from the Third National Climate Assessment's Health Chapter.

#### **Mental Health**

*People's anxiety and distress about the implications of climate change are undermining mental health and well-being, according to a new federal report reviewing existing research on the topic. Issued by the U.S. Global Change Research Program, the report is the first time the federally mandated group has published an assessment solely focused on climate change and health.*

*The report is notable for another reason, too: It contains a chapter devoted to mental health and well-being, a significant step forward for an assessment of this type, says lead author Daniel Dodgen, PhD, a clinical psychologist at the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response. "I think people realize that if you're going to talk about health, you have to talk about mental health," he says.*

*The report also found that:*

*Exposure to climate- and weather-related natural disasters can result in mental health consequences such as anxiety, depression and post-traumatic stress disorder. A significant proportion of people affected by those events develop chronic psychological dysfunction.*

<sup>5</sup> Fourth Climate Change Assessment – LA Region pg 50

<sup>6</sup> Indicators of Climate Change in California pg 161

I88-2  
cont.

*Some people are at higher risk for mental health consequences from weather-related disasters. Among them are children, pregnant and postpartum women, people with pre-existing mental illness, people who are economically disadvantaged, those who are homeless and first responders to the disaster.*

*Representations of climate change in the media and popular culture can also influence a person's stress response and mental well-being.*

Climate change is threatening mental health -- American Psychological Association

1. Target populations of Concern
2. Outside workers (including County staff)
3. Children
4. Medically fragile, asthmatics, etc.
5. Pregnant women

Pregnancy effects According to research published in Nature Climate Change, birth rates were 5% higher on days when the temperature exceeded 90 degrees Fahrenheit. And, perhaps more concerning, births on those days occurred up to two weeks earlier — and 6.1 days earlier on average — than they would have otherwise.

*“That’s enough to take somebody from what’s considered to be a pretty healthy pregnancy into a ‘we are somewhat worried’ pregnancy,” said Alan Barreca, a UCLA professor of environment and human health and lead author of the study.... Early delivery could cause long-term harm to the affected infants. Previous research has shown that early deliveries are linked to cognitive differences later in childhood, though it’s unclear whether this applies to heat-related early deliveries specifically. Another study found a direct link between mothers experiencing extreme heat during their third trimester of pregnancy and reduced income for their offspring once they reach adulthood. That might be due in part to earlier deliveries, too.*

*Air Quality - Hotter future temperatures (Section 2.2) will act to increase surface ozone concentrations both due to chemistry producing more ozone and higher rates of biogenic emissions, while increases of water vapor also influence chemistry by increasing ozone production in already polluted areas (Steiner et al. 2006). It’s been estimated that ozone could increase up to 5-10 parts per billion (ppb) by 2050 in LA (Jacobson 2008; Pfister et al. 2014), and the number of days with ozone over 90 ppb could increase between 22-33 days (Abdullah Mahmud et al. 2008).<sup>7</sup>*

## Water

### **Drought**

Anticipate a 64% decrease in snowpack by end of century<sup>8</sup>

*By virtue of its Mediterranean climate and location along the periphery of the Pacific subtropical high, California experiences warm and dry summers with wet winters. During the wet winter months, which in Southern California typically begin in November and terminate in March, the bulk of precipitation arrives in a few, large storms (Dettinger et al. 2011; Oakley et al. 2018b). Should these storms not arrive due to*

<sup>7</sup> Fourth Climate Change Assessment – LA Region pg 20

<sup>8</sup> Ventura\_Climatechange\_Review\_Oakley.pdf slide 20

I88-2  
cont.

*the presence of a persistent blocking ridge of high pressure in the North Pacific Ocean, precipitation deficits will be large (Cook et al. 2018). These deficits will be superimposed with climatologically high evaporative demands and may be exacerbated by above-normal winter season temperatures. Such dry years occur commonly in California, and multi-year periods of severe drought are not uncommon. However, evidence from various locations in California and throughout the southwestern United States indicates that extreme droughts lasting decades to several centuries have occurred numerous times since the end of the last ice age (e.g., Stine 1994; Benson et al. 2002; Woodhouse et al. 2010; Dingemans et al. 2014). The most recent extreme and persistent droughts occurred during the Medieval period, approximately 800-1000 years ago, with locally warm and dry conditions inferred from paleoproxy evidence provided by sedimentary cores taken from Zaca Lake in the San Rafael Mountains of Santa Barbara County (Dingemans et al. 2014). These droughts indicate that such extreme periods of aridity can occur under natural conditions (i.e., independent of human-driven changes in greenhouse gas concentrations) implying consideration of extended drought is prudent to sustainable water resource management, especially if projected warming increases drought risk Hatchett et al. 2015). Modeling studies of the Central Sierra Nevada have shown these droughts to be of comparable precipitation deficits to the most recent California Statewide drought that began in winter 2012 and ended in January of 2017 (Hatchett et al. 2015). The severity of the recent drought was exacerbated by anomalously warm temperatures driving a surplus in atmospheric evaporative demand and reducing the fraction of precipitation falling as snow in mountain regions (Williams et al. 2015b; Hatchett et al. 2017). The duration and severity of the recent drought varied statewide, with Ventura County being one of the first regions to go into drought conditions and one of the last to emerge (U.S. Drought Monitor 2019).<sup>9</sup>*

I88-2  
cont.

## Rain

### 4.2 Implications of Changes in Precipitation

- *The number of dry days increases in the spring and fall (Fig. 4.6); however, there is little change projected in precipitation totals for these seasons (Fig. 4.2), implying some intensification of precipitation in these seasons, although these increases grow with time (Appendix A). Prolonged dry periods are associated with wildfire activity (e.g., Nauslar et al. 2018). With more dry days there may be potential for a longer wildfire season due to additional opportunities for persistence of dry conditions.*
- *Groundwater recharge is projected to decrease in the Southwest in a warming climate (Niraula et al. 2017) and may in part be related to increasing rainfall intensities (Dettinger and Earman 2007). Precipitation intensification at the seasonal to sub-daily timescales may have implications for the methods by which groundwater recharge occurs or how surface water is conveyed, captured, and stored.*
- *Roughly half of models project more frequent days exceeding historic 85th percentile daily precipitation totals (Fig. 4.7), resulting in more days with storm water management concerns if these outcomes are realized.*
- *Intensification of sub-daily precipitation (Figs. 4.8-16) raises concerns for increased flash flooding (Modrick and Georgakakos 2015), landslides, and debris flows (e.g., Oakley et al. 2018a) in a warming climate. In addition to the potential for increased threats to life and property, this may have impacts on infrastructure design and water resource management.*

<sup>9</sup> Ventura Climate 2019\_Bookmarked.pdf pg 51-52

- *Potential for storms with similar atmospheric characteristics to historic events to produce greater event total precipitation due to warming and ability for greater amounts of water vapor to be present in the atmosphere (Figs. 4.17-18; Prein et al. 2017).*

- *With uncertainty in annual precipitation changes, potential for increasing dry days, and increased temperatures (Section 3) and evapotranspiration (Section 5), diversified water supply portfolios will likely allow for more resilient water management (Sterle et al. 2019).<sup>10</sup>*

Atmospheric rivers (Ars) show a 20-50% increase in frequency of ARs along west coast and studies suggest fewer, but stronger and longer duration ARs in SoCal.<sup>11</sup> ARs can transport ten times the volume of the Mississippi River in water vapor and release a significant amount of the water when they rise over the coastal mountains.

*Moreover, the peak season of atmospheric rivers may also lengthen, which could extend the flood-hazard season in California. The current generation of GCMs project a nearly 40% increase in precipitation during atmospheric river events over southern California by the late-21st century under RCP8.5. The number of atmospheric river events is also projected to increase in the future, possibly around a doubling of days by the end of the century (Warner et al. 2015; Hagos et al. 2016; Gao et al. 201512).*

Short-duration, high intensity rainfall

Because of their ability to trigger flash floods and mass movements, short duration, high intensity precipitation events pose a major threat to life and property in Ventura County.<sup>13</sup>

Floods 1.5-2x more likely to exceed top 0.05% of historic hourly precipitation<sup>14</sup>.

If these rains occur after a significant fire then widespread flooding, mud flows and/or slope failure could result.

#### **Evaporative Demand**

*Evapotranspiration represents the fluxes, or transfer, of moisture from open water and soil moisture (evaporation), and plant transpiration of water to the atmosphere under ambient conditions....*

*Historically, positive changes in ETO have been associated with increased water demand (Hobbins and Huntington 2017), increased wildfire activity (Abatzoglou and Williams 2016), and ecosystem impacts (Schwinning and Sala 2004). Thus, with projected ETO increases, the following impacts may be anticipated:*

- *All seven models project county-wide increases in annual ETO, with minimum increases of at least 2 in. and maximum increases of approximately 6.5 in, which may impact water demand for crops (Hall et al. 2018), ecosystems, and municipal water use.*

I88-2  
cont.

<sup>10</sup> VenturaClimate2019\_Bookmarked.pdf pg 31

<sup>11</sup> Ventura\_Climatechange\_Review\_Oakley.pdf slide 19

<sup>12</sup> Fourth Climate Change Assessment – LA Region pg 14

<sup>13</sup> VenturaClimate2019\_Bookmarked.pdf pg 6

<sup>14</sup> Ventura\_Climate\_Projections\_Hatchett.pdf slide 35

- *The greater thirst of the atmosphere will deplete soil and plant moisture leading to faster rates of fuel moisture decline and longer periods of dry vegetation. This will increase the susceptibility of landscapes to wildfire and drought, as there is the potential for vegetation to dry more quickly and for longer periods of time.*
- *Reductions in soil moisture associated with increased ETO may reduce runoff production in some areas. The greatest increases in ETO (and thus reductions in soil moisture) are projected to occur in inland elevated terrain.<sup>15</sup>*

*Although the greatest changes in absolute ETO occur during summer (Fig. 5.2c), percentage-wise, the largest increases (between 4–8%) are observed during fall in terms of spatial extent and magnitude (Fig. 5.3d). This will add stress to vegetation, decrease fuel moisture, and increase fire risk. Dry conditions extending into the late fall and early winter have a greater chance to coincide with Santa Ana winds. These conditions can lead to destructive wildfires such as the December 2017 Thomas Fire (Nauslar et al. 2018) and the November 2018 Woolsey Fire. Spring and summer show similar magnitudes of change and are consistent in the locations of change, though the core regions of greatest percentage increases shift westward from the Santa Clara River watershed (Fig. 5.3b) to the Ventura River watershed (Fig. 5.3c) during summer<sup>16</sup>.*

#### *Beyond Los Angeles: Imported Water Availability*

*The LA region is intimately connected to other Western U.S. watersheds. Water supply agencies rely on imported water for a majority of regional water supply (Gold et al 2015; Porse et al. 2017). Three main water sources supply metropolitan LA water agencies: the California Aqueduct as part of the State Water Project, the Colorado River Aqueduct that supplies southern California's allocation of Colorado River water, and the LA Aqueduct that imports water from the Owens Valley. Imported sources comprise a majority of water demands. For instance, in LA County, imported sources meet 55-60% of annual urban water demands, with the remaining amount supplied by groundwater (35-40%) and recycled water for nonpotable uses such as irrigation. From 2000-2010, these water agencies received an annual average of 810,000 acre-ft from MWD's imported sources, through in recent years averaging closer to 700,000 acre-ft. The entire American Southwest is expected to see increased drought and reduced availability of future water for agriculture and growth (MacDonald 2010). Such large-scale changes across a broad geography, which includes California, will pose unique risks for each of the massive infrastructure systems that import water to LA.*

#### *A substantial portion of Ventura County's water comes from the State Water Project through MWD.*

*The State Water Project of California brings water from the northern and western Sierra Nevada mountains south through the Sacramento-San Joaquin Delta to urban and agricultural users in southern California. Historically, the State Water Project contributed the majority of water supply to MWD's sources (53% from 1976-2010). Numerous studies have documented the likely shifts in precipitation regimes that will result from climate change in California, including reductions in snowpack, advances in the timing of runoff leading to reduced seasonal capture and storage capacity, and hotter coastal and*

I88-2  
cont.

<sup>15</sup> VenturaClimate2019\_Bookmarked.pdf pg 45-46

<sup>16</sup> VenturaClimate2019\_Bookmarked.pdf pg 48



*inland temperatures increasing demand (Anderson et al. 2007; Brekke et al. 2004; N. L. Miller, Bashford, and Strem 2003; Tanaka et al. 2006; Vicuna and Dracup 2007; Dracup and Vicuna 2005). Additionally, the system of reservoirs will face increasing operational risks in managing more extreme rainfall events and preventing floods (Brekke et al. 2009). Applying such projections in planning can be challenging, given long-term uncertainties and sunk costs in current infrastructure (Groves, Yates, and Tebaldi 2008). Given these long-term likelihoods, the reliability of water deliveries from northern California will likely stir significant continued political debate and uncertainties, especially regarding future management alternatives for critical habitat and conveyance areas of the California Delta (Madani and Lund 2010).<sup>47</sup>*

#### CASE STUDY | MANAGING FOR SCARCITY TO WEATHER THE DROUGHT Caryn Mandelbaum

**T**he Inland Empire Utilities Agency (IEUA) water and energy optimization is a great example of climate resiliency in one of the hottest areas of southern California. The IEUA's service area covers 242 square miles where Riverside and San Bernardino Counties meet and where summer temperatures soar to over 110°F (43°C). The IEUA distributes imported and regionally-produced water and provides industrial/municipal wastewater collection and treatment services to more than 830,000 people throughout its nine member agencies.

How, you might ask, did they manage to have surplus water during the state's worst-ever drought? The short answer is they had been managing for scarcity for the past 20 years. Leadership had the foresight to establish a grant writing department that matched every dollar spent with grants for efficiency projects. They invested nearly \$500 million in developing regional water supplies, including state-of-the-art recycled water and groundwater recharge facilities, water use efficiency programs, and infrastructure improvements that avoided leaks.

They also developed close ties with their customers through public affairs staff and communications campaigns. This allowed the water agencies to enforce water budgets for each ratepayer. The budget provided a specific monthly allowance of water, depending on the number of occupants and outdoor footprint. The outdoor space was measured aerially to the square foot. They learned about how their consumption patterns measured up to prior use and that of their neighbors. When customers exceeded their budget, they were penalized and provided with tools for conservation. Armed with information and tools, ratepayers were able to better control their water consumption.

Remarkably, while the IEUA developed surplus water during California's historic drought, they were also becoming one of the most energy-efficient utilities in the state. In 2010, the agency installed the world's largest fuel cell system powered by renewable biogas and reduced energy consumption by nearly 25% upgrading operations. In 2017, they launched an advanced energy storage system designed by Tesla that integrates solar, wind, biogas, and grid resources to optimize renewable generation, reduce demand, and lower energy costs. Together with dynamically controlling consumption, IEUA is on track to go gridless by 2020 with almost no capital investment by the Agency.

I88-2  
cont.

<sup>47</sup> Fourth Climate Change Assessment – LA Region pg 62-63

### Earthquake/levee collapse threats to water supply

*"The problem becomes almost intractable," he continued. "Keep in mind, one failure took \$100 million to fix, and now we're looking at scores of failures, so the water managers for the state are petrified of this. They are not sure they can ever get this system up and running, or at the very least, it's going to take multiple years. So this is pretty serious."*

*"The [State Water Project](#) is essential, both from the volume standpoint as it provides a lot of our water, and from a water quality perspective, as the water quality is quite good from it. As currently configured, the levees are highly vulnerable, not necessarily for San Andreas events but for the local events directly beneath. The repair time is uncertain; it's almost certainly very long. They don't even know how long it would take, and I think by any measure, it is not resilient, and this is the problem."*

<https://mavensnotebook.com/2018/01/03/earthquake-resilience-southern-californias-water-distribution-systems/>

### Making Water Conservation a California Way of Life

"Making Water Conservation a California Way of Life" (Governor's Executive Order B-37-16) replaces and increases water conservation requirements. AB 1668 (Friedman, 2018) and SB 606 (Hertzberg, 2018) implement various provisions of the Governor's Executive Order including the establishment of long-term urban water use efficiency standards, an indoor water budget of 55 gpcd which decrease over time, and outdoor allocations based on irrigated or irrigable landscaped area.

Based on industry recommendations the state set a provisional standard for indoor water use of 55 gallons per person, per day. This standard was based on a report produced by the Water Research Foundation. To ensure that this standard is reasonable the state will be funding a research study to determine an appropriate budget.

Also, the state is developing an outdoor water usage standard based on irrigated area and other factors like local climate conditions.

Based on these standards, all water districts will be given a maximum water budget for their agency. The budgets are being developed currently, with a draft budget expected January 2021, and the final budget at the end of 2021. While the state is developing the standards, we will be developing the tools and processes necessary to track and stay within the budget.

Proposals also include a requirement for each agency to develop a five-year drought plan, including conservation strategies necessary to achieve conservation levels that range from ten percent up to, and beyond, fifty percent reduction in water usage.

Each agency must document the steps to be taken in the event of a water conservation reduction of:

- 10%
- 20%
- 30%
- 40%
- 50%
- Beyond 50%

I88-2  
cont.

***How climate change could threaten our water supply***

*Published 11:00 a.m. PT July 8, 2017 |*

*Gov. Jerry Brown announces that California will host a global climate summit.*

*SACRAMENTO - When it comes to California and climate change, the predictions are staggering: coastal airports besieged by floodwaters, entire beaches disappearing as sea levels rise.*

*Another disturbing scenario is brewing inland, in the sleepy backwaters of the Sacramento-San Joaquin Delta. It's a threat to the Delta's ecosystem that could swallow up a significant portion of California's water supply.*

*Scientists from government and academia say rising sea levels caused by climate change will bring more saltwater into the Delta, the hub of California's water-delivery network. As a result, millions of gallons of fresh water will have to be flushed through the Delta, and out into the ocean, to keep salinity from inundating the massive pumping stations near Tracy. That will leave less water available for San Joaquin Valley farmers and the 19 million Southern Californians and Bay Area residents who depend on Delta water — eventually as much as 475,000 acre-feet of water each year, enough to fill Folsom Lake halfway, according to one study by the Public Policy Institute of California.*

*"With rising sea levels, with climate change, that creates additional pressure coming in from the ocean," said Michael Anderson, the state's climatologist, in a recent interview. "Sea level rise is going to become more of an influence."*

*It figures to become a pocketbook issue for practically any Californian who drinks water that runs through the Delta. A 2010 study by scientists from the University of California, Davis said rising seas, coupled with the inundation of some islands in the western Delta, will translate into higher costs for purifying water for human use. The additional cost could go as high as \$1 billion a year, "making the Delta less desirable as a conventional water source," the study said.*

*That cost doesn't include the \$17.1 billion Gov. Jerry Brown proposes to spend on the Delta tunnels, his controversial plan for reshaping the estuary's plumbing system.*

*Brown's administration is heralding the threat from climate change as one of the reasons for building the tunnels, which would increase water bills for urban Southern Californians and San Joaquin Valley farmers. An environmental impact statement released by state and federal officials in December said the tunnels are needed to prevent a significant cutback in water deliveries from the Delta.*

*Without the tunnels, the ability to pump water south "will be reduced under future climate and sea level rise conditions," state and federal officials wrote. "Delta exports would be reduced by as much as 25 percent by the end of the century."*

*Complicating the issue, climate scientists also agree a warmer climate will mean more rain and less snow. The Sierra snowpack serves as a giant reservoir that naturally releases water long after the rainy season ends. If more of California's precipitation falls as rain instead of snow, much of that water will flow to the ocean in winter and spring, while it's still raining. That will leave less water available in summer to satisfy human needs and to offset salinity in the Delta.*

I88-2  
cont.

*Saltwater is already a problem at the Contra Costa Water District, which serves 500,000 residents in eastern and central Contra Costa County. Its location near the spot where water becomes brackish in the Delta puts Contra Costa on the front lines of the battle against salinity from the ocean. One of its four main intake pipes at the western edge of the Delta is precariously close to the point where water becomes too salty to drink without substantial treatment.*

*The agency has invested millions on intake pipes that are further and further away from the ocean. In 1997 it opened an intake along the Old River closer to the heart of the Delta. In 2010 it spent \$80 million building another intake a few miles east of the Old River facility. It considered building a desalination plant a few years ago, but the project, estimated to cost \$175 million, has been tabled.*

*Contra Costa's main weapon against salinity is Los Vaqueros Reservoir, a 19-year-old man-made lake. Though it's in the southwest Delta, it feeds off a pipeline from a San Joaquin River tributary from the east. Its purpose is to hold 160,000 acre-feet of fresh water that Contra Costa uses to dilute the supply that washes in from the Pacific.*

*"Things can get very salty for prolonged periods of time," said Maureen Martin, the agency's senior water resources specialist, during a recent tour of Los Vaqueros.*

*Contra Costa has spent nearly \$560 million on Los Vaqueros, and it isn't done yet. Working with 11 other Bay Area agencies, it's developing a plan to expand Los Vaqueros' capacity by two-thirds, an \$800 million project.*

*Martin said her agency doesn't consider sea-level rise "an imminent threat to Delta water quality." But the scientific projections are influencing Contra Costa's long-term planning on Los Vaqueros and other facilities.*

*Climate change "would probably cause the Delta to become saltier," she said. If climatologists are correct, the just-ended drought gave Delta residents a taste of things to come. In 2015, when the drought was at its worst and relatively little fresh water was trickling through the estuary, state officials worried about a surge of saltwater gushing in. The Department of Water Resources built a temporary rock barrier on the West False River, near the heart of the Delta, to hold back the salty ocean water.*

*The price was \$37 million, including the expense of removing the 150,000 tons of rocks when the rainy season started. State officials declared it a successful investment. The barrier helped the state avoid releasing 90,000 acre-feet of water from upstream reservoirs to flush out the salinity.*

*Over the long haul, state officials believe keeping the salt at bay will be crucial to the viability of the State Water Project and the federal government's Central Valley Project, the delivery networks that move much of Northern California's water through the Delta to the water agencies of Southern California and the San Joaquin Valley.*

*It's a task that could become increasingly difficult as sea levels rise. Not only will higher waters bring a generally higher volume of salt into the estuary, they will put more stress on the 1,100 miles of levees protecting Delta farms and homes. A levee breach could inundate the SWP and CVP pumping stations with saltwater, forcing them to shut down and reduce operations.*

*It represents one of the state's arguments for the tunnels project: By diverting a portion of the Sacramento River's flow at Courtland, at the northern fringe of the Delta, and piping it directly to the*

I88-2  
cont.

*Tracy pumps, the state and federal water projects can sidestep much of the saltwater and keep pumping water more reliably.*

*"The location of the north Delta diversion facility is further inland, making it less vulnerable to salinity intrusion," officials wrote in the environmental report last December.*

*Tunnels opponents aren't swayed by that argument.*

*They don't dispute that rising seas will bring more salt to the Delta. But they say the tunnels would actually worsen the problem and make Delta water dangerously salty for farming and drinking water needs. By pulling some of the fresh water out of the Sacramento at the upstream location, opponents fear it will increase the salt concentration in the remaining water flowing through the Delta. In that respect, they're insulted that the threat from global warming is being used to justify the project.*

*"Whatever the truth might be about the extent or arrival of (climate) changes, the theory is being used as one more arrow shot at us," said John Herrick, attorney for the South Delta Water Agency.*

*"There isn't a shadow of a doubt in our minds that once they're able to take water from up north, they'd doom us," he added.*

*Distributed by Tribune Content Agency*

I88-2  
cont.

<b>Letter 188</b>	<b>John Brooks</b> February 27, 2020
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- I88-1      This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The commenter refers to more detailed comments provided later in the letter; refer to response to comment I88-2, below. Also, the commenter refers to a letter submitted by Climate First: Replacing Oil & Gas. See responses to Letter O20.
- I88-2      The comment provides suggested edits to policies proposed in the 2040 General Plan and suggests additional topics that could be considered in the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Also, refer to Master Response MR-1 for discussion of how the 2040 General Plan, its policies and programs, and mitigation measures address greenhouse gas emissions.

**From:** John Chambers <jechambers330@gmail.com>  
**Sent:** Thursday, February 27, 2020 6:35 AM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan Draft EIR Comment

Letter  
189

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

I89-1

I89-2

I89-3

I89-4

- |   |   |       |
|---|---|-------|
| <u>2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.</u>   | I | I89-5 |
| <u>3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."</u>   | I | I89-6 |
| <u>4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.</u>   | I | I89-7 |
| <u>5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.</u>  | I | I89-8 |
| <u>The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.</u> | I | I89-9 |

Sincerely,

John Chambers

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John Chambers



<b>Letter I89</b>	<b>John Chambers</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter I9. The responses below provide cross references to the portions of Letter I9 where responses to the same comments have already been provided.

- I89-1      Refer to response to comment I9-2 regarding the history of the McLoughlin family and their land in Ventura County.
- I89-2      Refer to response to comment I9-3 regarding statements in the Coastal Area Plan.
- I89-3      Refer to response to comment I9-4 regarding the adequacy of the draft EIR.
- I89-4      Refer to response to comment I9-5 regarding analysis of social and economic issues in the draft EIR.
- I89-5      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I89-6      Refer to response to comment I9-7 regarding the adequacy of the draft EIR.
- I89-7      Refer to response to comment I9-8 regarding analysis of social and economic issues in the draft EIR.
- I89-8      Refer to response to comment I9-9 regarding water supply.
- I89-9      Refer to response to comment I9-10 regarding the adequacy of the draft EIR.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Tuesday, February 18, 2020 12:21 PM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I90**

**You have a NEW Comment**

**Name:**  
John Cloonan  
**Contact Information:**  
johncloonan@yahoo.com

**Comment On:**  
The responsibility of the Board decision to support the constituents not commerce.

**Your Comment:**

Sunday, February 16, 2020

Re: Draft General Plan and DEIR

Ventura County Board of Supervisors:

I am urging you to take meaningful action on the above documents coming before you that are schedule to have the public comments close this 27th.

Your physical and mental health and the health of your constituents as well as others in California, and indeed our global family are at stake when you make your decisions. Meaningful, measurable enforceable reductions to meet California's climate goals are necessary.

California's perspective, guidelines and procedures are antiquated as are our County's own. It is necessary for you as individuals and as a Board, to take serious and bold measures to reel in the oil industry. Oil has had its day and stockholders have benefitted nicely. Ventura County and its citizens have benefitted from the oil industry, also. But the County, State, and Nation have suffered the health and climate consequences of lax regulation. Even if technology finds a "clean burn" solution - the end of oil can be expected.

The Los Angeles Sustainability Plan, aimed at meeting the goals of the Paris Climate Agreement, has clear and bold goals: "By eliminating fossil fuel production in the county, including drilling, production and refining, the county will protect its residents from harmful local pollution that inequitably burdens low-income communities and communities of color." And this comes from the second largest oil-producing county in California. We need a similar goal for Ventura County.

I realize there are challenges you all face in this threading the needle legal world. It falls to you to do so for the sake of those with lives on the line in a polluted world. We will all ultimately benefit from measurable, enforceable reductions sufficient to meet California's climate goals. It is clear to me, and I suspect to you in your personal quiet times of contemplation, that in the final analysis, there is an overriding benefit to the population of this county for the adoption of the strongest possible measures to insure that greenhouse gas emission are curbed to protect air quality and to ensure a safe, sustainable future for all county residents.

All the best.

John

John Cloonan  
31 N Laurel St #1  
Ventura, CA 93001-5066  
johncloonan@yahoo.com

I90-1

I90-2

I90-3

<b>Letter I90</b>	<b>John Cloonan</b> February 18, 2020
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- I90-1      The comments about the need for enforceable reductions to meet California’s climate goals are noted. Refer to Master Response MR-1for discussion of the draft EIR’s detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.
- I90-2      Refer to Master Response MR-4, Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations) regarding the findings and conclusions related to phasing out the oil and gas industry. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopted a final 2040 General Plan.
- I90-3      This comment urges the County to adopt the strongest possible measures to reduce GHG emissions that are measurable and enforceable. Refer to Master Response MR-1for discussion of the draft EIR’s detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce GHG emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.

**From:** John Foster <jfoster@greenwood-associates.com>  
**Sent:** Thursday, February 27, 2020 10:33 AM  
**To:** General Plan Update  
**Subject:** Comments, Archaeology

Letter  
I91

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I would urge the County to include how the agency would establish a "preponderance of evidence that the resource is not archaeologically or culturally significant." See below. How would this be done and could it be appealed?

The number of archaeological sites in Ventura County is decreasing at a rapid rate and the definition of archaeological significance should be revised, "that all Native American archaeological sites, should be considered significant since the prehistoric identity of the Indigenous groups is tied solely to archaeological evidence." Loss of any sites would irrevocably result in loss of significant portions of their culture.

I91-1

Thank you for your consideration.

John M. Foster, RPA  
 President, Greenwood and Associates

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on cultural, tribal cultural, or paleontological resources if it would:

Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not archaeologically or culturally significant. Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources. Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant. Cultural, Tribal Cultural, and Paleontological Resources Ventura County 4.5-6 2040 General Plan Draft Environmental Impact Report Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074. Result in the disturbance of human remains, including those interred outside of formal cemeteries. Result in grading and excavation of fossiliferous rock (identified as "Moderate to High" or "High" on Table D.2 of the ISAG) or increase access opportunities and unauthorized collection of fossil materials from valuable sites.

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John M. Foster  
 President  
 Greenwood and Associates

<b>Letter I91</b>	<b>John M Foster</b> February 27, 2020
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This comment letter repeats a comment provided in Letter O30. The response below provides cross references to the portions of Letter O30 where responses to the same comments have already been provided.

I91-1            The comment inquires as to how the County would “establish a preponderance of evidence” that an archaeological or cultural resource is significant, asserts that archaeological sites in Ventura County are “decreasing at a rapid rate” and suggests a revised definition of “archaeological significance.” Refer to response to comment O30-1 for discussion of these issues.

Susan Curtis,

**Letter  
I92**

The EIR admits that increased fuel loads directly impacts wildfire risk. The County writes in the EIR that "managing fuel through activities such as vegetation removal and controlled burns, the County and other agencies would be directly reducing the chance of wildfire as well as fuels that would feed wildfires..."

However, the County failed to analyze the impacts of policies COS-3.2, COS-1.15, Implementation Program COS-H and Implementation Program COS-C and others which increase fuel load and vegetation that "feed wildfires."

The County has not conducted a full and complete analysis on the General Plan policies that will increase wildfire risk. Furthermore, they have failed to offer any mitigation to reduce this risk.

This needs to be addressed, revised and recirculated.

I92-1

I92-2

Thank you for your time

Sincerely John Vanoni  
Vanoni AG. Construction Inc.

<b>Letter I92</b>	<b>John Vanoni</b> No date
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- I92-1 The comment states that the draft EIR does not analyze the impacts of 2040 General Plan policies that would increase fuel load and vegetation, thus increasing wildfire fire risk. See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I92-2 For the reasons explained in response to comment O32-30, the draft EIR analysis of potential wildfire impacts is adequate and no revisions are warranted. Also, refer to Master Response MR-7 which explains in detail why recirculation of the draft EIR is not required.

**From:** JOSEPH LAMPARA <jlamp56@msn.com>  
**Sent:** Wednesday, February 26, 2020 8:02 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** 2040 General Plan Draft EIR Comment

Letter  
I93

Dear Ms. Curtis:

CEQA guidelines require the Lead Agency to require FEASIBLE mitigation measures to lessen or avoid significant effects on the environment. The agency does not have unlimited authority to impose mitigation measures.

Per CEQA guidelines: Mitigation measures must be feasible. Feasibility analysis must include evidence and data that the additional costs or lost profitability are not sufficiently severe as to render "it impractical to proceed with the project." The Courts have determined that if the costs of the mitigation or alternative are so great that a reasonably prudent person would not proceed with the project, this mitigation measure is deemed unfeasible.

I93-1

Example:

Proposed Mitigation Measure AG-2 (Implementation Program AG-X): The County has failed to disclose and analyze the following:

- 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
- 2) The cost per acre to purchase each category of farmland;
- 3) The anticipated cost of establishing a conservation easement for each category of farmland;
- 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
- 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
- 6) any information that could constitute a "plan" for management of farmland in conservation easements;
- 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
- 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel;
- 9) An analysis of potential conflicts with existing ordinances and statutes (such as the Non-Coastal Zoning Ordinance) to ensure that the smallest possible required mitigation acreage required does not conflict with the County's minimum lot sizes.

I93-2

Respectfully,  
 Joseph Lampara

<b>Letter I93</b>	<b>Joseph Lampara</b> February 26, 2020
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- I93-1      The commenter's understanding of the feasibility requirements for mitigation are noted. The California Environmental Quality Act requires that an EIR "describe feasible measures which could minimize significant adverse impacts" (State CEQA Guidelines, § 15126.4(a)(1)). It is the obligation of the decision-making body of the lead agency that chooses to approve a project for which an EIR has been certified to determine if there are considerations that make the mitigation identified in the EIR infeasible. These factors can include economic feasibility.
- I93-2      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.



**VIA ELECTRONIC MAIL:** [GeneralPlanUpdate@ventura.org](mailto:GeneralPlanUpdate@ventura.org)

February 25, 2020

Ventura County Board of Supervisors

Attn: RMA Planning Division

General Plan Update

100 Victoria Avenue L#1740

Ventura, California 93009-1740

FEB 28 2020

Letter  
194

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I94-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was

I94-2

very recently experienced based on proposed policies at LAFCo.

These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I94-2  
cont.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I94-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I94-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I94-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation

I94-6

measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I94-6  
cont.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I94-7

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I94-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I94-9

Sincerely,



<b>Letter I94</b>	<b>Josh Wells</b> February 25, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I94-1      Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I94-2      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I94-3      Refer to response to comment I4-3 regarding water availability and cost.
- I94-4      Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I94-5      Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I94-6      See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I94-7      Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I94-8      The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I94-9      Refer to response to comment I4-9 and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** June Behar <beharjune@gmail.com>  
**Sent:** Wednesday, February 26, 2020 1:17 PM  
**To:** General Plan Update  
**Subject:** Comments on General Plan Update

**Letter  
I95**

I am a resident of Upper Ojai, unincorporated Ventura County, at 12048 Sulphur Mountain Road, Ojai CA 93023. Please add this material to the public comments on the VC2040 General Plan Update:

I95-1

Setting policy to deal with climate change in Ventura County requires expert scientific and technical input so that the Climate Action Plan (CAP) is meaningful and can achieve significant greenhouse gas emission reduction goals. VC should contract with an experienced consulting team as Los Angeles City and County have done in order to improve emissions reduction efforts here and meet state climate goals.

I95-2

Ventura's General Plan Update should include the goal of eliminating fossil fuel production in the County, including drilling, production and refining, in order to reduce pollution. Phasing out production should include policy measures, strict enforcement of regulations, and the closing of loopholes that, for example, would allow trucking of oil and produced water if oil companies claim pipeline construction costs are too high. Maintain Policy COS-7.7 and Policy COS-7.8 as recommended by the VC Board of Supervisors.

I95-3

Climate Action Plan policies must be able to produce measurable and enforceable emission reductions instead of asking for voluntary actions from the County's oil and gas operators. Revise this plan to ensure that greenhouse gas emissions and groundwater pollution will be curbed, starting immediately. In particular, maintain and defend the five-pound air emissions limit for the Ojai Valley, and force projects subject to CEQA review to fully evaluate TOTAL air emissions and require strict mitigation of local air quality impacts.

I95-4

In conclusion, it is critical that Ventura County adopt climate policies for the future based on expert study and experience; provide for strong and rigorous evaluation of potential adverse impacts in all projects, and enforce regulations without allowing loopholes. We longtime property owners and our families, the future generations of our population, deserve no less.

**Letter  
I95**

**June Behar**  
February 26, 2020

- I95-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
- I95-2 This comment expresses an opinion about the Climate Action Plan that was prepared for the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan. Refer to Master Response MR-1 for a discussion of the scientific and technical basis of the climate planning in the 2040 General Plan, as well as the extraneous factors that limit reasonably feasible emissions reductions.
- I95-3 Refer to Master Response MR-4, Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations), Section MR-4.G Pipeline Requirements, and Section MR-4.F Flaring regarding the findings and conclusions related to phasing out the oil and gas industry, pipelines, and flaring

in oil and gas operations. The remainder of this comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopted a final 2040 General Plan.

I95-4

The comment requests measurable, enforceable Climate Action Plan policies, maintenance of the air emissions threshold of significance for the Ojai Valley, and evaluation and mitigation of the total air emissions of discretionary projects subject to the California Environmental Quality Act (CEQA). The comment also includes reference to enforcing policies without allowing loopholes.

Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions.

As discussed in the draft EIR and explained further in response to comment O20-14, the comment refers to a threshold of significance for daily reactive organic gases and oxides of nitrogen emissions in the Ojai Valley which is referenced in the Ojai Valley Area Plan. This threshold, which applies to sources that are not permitted by the Ventura County Air Pollution Control District (VCAPCD), was added to VCAPCD's Air Quality Assessment Guidelines in 1989 and the reference to this threshold was thereafter added to the Ojai Valley Area Plan in 1995. The 2040 General Plan would not change this threshold.

Similarly, the 2040 General Plan would not affect the methodology for calculation of impacts to air quality at the project level. As explained in Section 4.3, "Air Quality," of the draft EIR (page 4.3-5), the County's Initial Study Assessment Guidelines state that the Air Quality Assessment Guidelines published by the VCAPCD should be used for determining thresholds of significance for air quality impacts. VCAPCD's guidance recommends the sample air quality checklist questions contained in Appendix G Section III(a-d) of the State CEQA Guidelines, with additional guidelines specific to Ventura County. Also refer to the response to comment O20-15 for discussion regarding the types of air emissions sources addressed by VCAPCD guidance and thresholds.

This comment expresses an opinion about the 2040 General Plan that is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

000000  
02/20/20 9:00Letter  
I96

Jurgen Gramckow  
c/o Hoffman, Vance & Worthington  
1000 S. Seaward Avenue  
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors  
Attn: RMA Planning Division  
General Plan Update  
800 Victoria Avenue L#1740  
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

I96-1

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

I96-2

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

I96-3

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

I96-4

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

I96-5

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

I96-6

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

I96-7

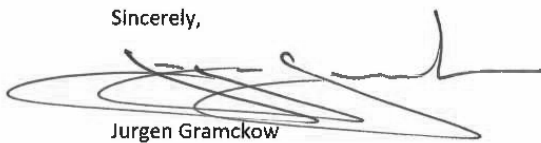
In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

I96-8

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

I96-9

Sincerely,



Jurgen Gramckow



<b>Letter I96</b>	<b>Jurgen Gramckow</b> February 24, 2020
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This comment letter repeats many of the same comments provided in Letter I4. The responses below provide cross references to the portions of Letter I4 where responses to the same comments have already been provided.

- I96-1      Refer to response to comment I4-1 regarding the adequacy of the draft EIR.
- I96-2      Refer to Master Response MR-5 regarding the feasibility of Mitigation Measure AG-2.
- I96-3      Refer to response to comment I4-3 regarding water availability and cost.
- I96-4      Refer to response to comment I4-4 regarding economic feasibility of 2040 General Plan policies that could affect agricultural operations.
- I96-5      Refer to response to comment I4-5 regarding the commenter's request for detailed studies and Master Response MR-6 for discussion of how the County appropriately uses the Background Report to describe the existing environmental setting in the draft EIR.
- I96-6      See response to comment O32-30 for a discussion of the potential for 2040 General Plan policies and programs that encourage tree planting and preservation for a discussion of the potential to increase wildland fire hazard.
- I96-7      Refer to response to comment I4-7 regarding potential incompatibilities with adjacent bicycle and pedestrian paths.
- I96-8      The commenter refers to letters submitted by Aera Energy. See responses to Letters O5 and O6.
- I96-9      Refer to response to comment I4-9 and Master Response MR-7, which explains in detail why recirculation of the draft EIR is not required.

**From:** Karen Lindberg <k.lindberg5@verizon.net>  
**Sent:** Monday, February 24, 2020 11:42 AM  
**To:** General Plan Update  
**Subject:** General plan /Environmental impact plan- comments

**Letter  
I97**

Hi,

I am a citizen that is deeply concerned about the impact of climate change on our county. I have noticed we have many oil wells in our county. I think our action plan should be aggressive like the LA plan and the Paris agreement. We need to have a goal of eliminating fossil fuel production in the county, including drilling, production and refining.

I97-1

Also I agree with the following policies:

1.Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

I97-2

2.Flaring should be allowed only in cases of emergency or for testing purposes.

I97-3

3.Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions.

I97-4

Thank you,

Karen Lindberg and John Tarascio, Newbury Park residents  
 1207 Knollwood Drive,  
 Newbury Park, CA 91320

<b>Letter I97</b>	<b>Karen Lindberg and John Tarascio</b> February 24, 2020
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- I97-1 Refer to Master Response MR-4, Section MR-4.J Potential to Stop Issuing Permits for New Wells (Phase Out Oil and Gas Operations), regarding the findings and conclusions related to phasing out oil and gas operations. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I97-2 Refer to Master Response MR-4, Section MR-4.G, “Pipeline Requirements,” regarding the findings and conclusions related to the conveyance of oil and produced water via pipelines instead of trucking. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I97-3 Refer to Master Response MR-4, Section MR-4.F, “Flaring,” regarding the findings and conclusions related to flaring in oil and gas operations. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I97-4 The comment states that the 2040 General Plan should be revised to achieve measurable, enforceable reductions in greenhouse gas emissions. Refer to Master Response MR-1 regarding the development of the 2040 General Plan policies and programs. No specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Saturday, February 1, 2020 9:44 AM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
198**

**You have a NEW Comment**

**Name:**  
 Karen Socher  
**Contact Information:**  
 kssocher@hotmail.com  
**Comment On:**  
 All of it  
**Your Comment:**

I feel we should set policy driven by reducing climate change and the draft update does not provide enough emissions reduction.	I 198-1
We can and should do better.	
The CAP addresses the consumption side by encouraging electric fuel vehicles and clean power for homes and businesses. It does not address the production side at all. Ventura County is the third largest oil and gas producing county in California. As such, we must do our part to reduce oil production through thoughtful, rigorous policy to phase out production.	I 198-2
This CAP will set the policies that will drive land use decisions and projects that affecting GHG emissions for the next 20 years. The planet depends on each county, municipality and country to do this right.	I 198-3
We need an expert team that will produce a plan that will meet the greenhouse gas emission reduction goals.	
The General Plan needs to reduce emissions that harm people and the planet.	
The Los Angeles Sustainability Plan, aimed at meeting the goals of the Paris Climate Agreement, has clear and bold goals: "By eliminating fossil fuel production in the county, including drilling, production and refining, the county will protect its residents from harmful local pollution that inequitably burdens low-income communities and communities of color." And this comes from the second largest oil-producing county in California. We need a similar goal for Ventura County. Another goal from the LA Plan: "Collaborate with DOGGR and unincorporated communities and affected cities to develop a sunset strategy for all oil and gas operations that prioritizes disadvantaged communities." Ventura County needs to do the same.	
Climate change is caused by fossil fuel production and consumption.	

<b>Letter I98</b>	<b>Karen Socher</b> February 1, 2020
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- I98-1      The comment asserts that the policies in the 2040 General Plan do not achieve enough emissions reductions and suggests that it inappropriately excludes policies related to production of non-renewable resources. Refer to Master Response MR-1 for discussion of the draft EIR's detailed quantitative and qualitative analysis of the 118 policies and 45 implementation programs included in the 2040 General Plan to reduce greenhouse gas (GHG) emissions in the county and the seven feasible mitigation measures included in the draft EIR to address the potentially significant GHG impacts of the 2040 General Plan and achieve additional GHG emissions reductions. No specific issues related to the content, analysis, conclusions, or overall adequacy of the draft EIR are raised in this comment. Therefore, no further response is provided.
- I98-2      The comment suggests that phasing out the production of oil and gas in the unincorporated county is an appropriate policy for inclusion in the 2040 General Plan. This industry is a source of projected GHG emissions and eliminating extraction activities would be expected to have a favorable reduction in emissions. Refer to Master Response MR-4 for response to the comment requesting inclusion of a General Plan policy to phase out oil and gas production in the county.
- I98-3      The comment notes that the Los Angeles Sustainability Plan includes a goal to develop a sunset strategy for oil and gas extraction and suggests that the County consider a similar strategy. Refer to response to comment I98-2, above. This comment also expresses an opinion about the 2040 General Plan and is not related to the adequacy of the draft EIR. Therefore, no response is required. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

**From:** Kari Aist <info@email.actionnetwork.org>  
**Sent:** Thursday, February 27, 2020 4:20 PM  
**To:** Curtis, Susan <Susan.Curtis@ventura.org>  
**Subject:** Climate change has environmental impacts!

Letter  
I99

**CAUTION:** If this email looks suspicious, DO NOT click. Forward to [Spam.Manager@ventura.org](mailto:Spam.Manager@ventura.org)

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

I99-1

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

I99-2

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I99-3

I want an EIR that covers major climate impacts via a systematic plan.

Thank you for listening to the people and doing what's right for the health of your constituents, the ones you represent.

I99-4

Remember this: we ALL live downstream.

Thank you—

Kari Aist  
[Mom4mykids@gmail.com](mailto:Mom4mykids@gmail.com)  
 8892 Tacoma St  
 Ventura, California 93004

<b>Letter I99</b>	<b>Kari Aist</b> February 27, 2020
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This comment letter repeats many of the same comments provided in Letter I3. The responses below provide cross references to the portions of Letter I3 where responses to the same comments have already been provided.

- I99-1      Refer to response to comment I3-1 regarding the commenter's concerns about climate change and the draft EIR analysis.
- I99-2      Refer to response to comment I3-2 regarding the use of the most current climate change science in the draft EIR analysis.
- I99-3      Refer to response to comment I3-3 regarding suggested mitigation measures.
- I99-4      This comment is a concluding statement and does not raise a significant environmental issue for which a response is required.

**From:** VC2040.org Comments <alan.brown@ventura.org>  
**Sent:** Monday, January 27, 2020 10:24 AM  
**To:** Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley  
**Cc:** Brown, Alan

**Letter  
I100**

### You have a NEW Comment

**Name:**  
Katharine S Simmons  
**Contact Information:**  
kay56094@gmail.com  
**Comment On:**  
New Draft Environmental Impact Report  
**Your Comment:**

According to a recent study of data by the Washington Post Ventura County ranks as the fastest-warming county in the Lower 48 states.

It is critical that Ventura County gets its climate policies RIGHT in the General Plan Update. The draft plan as currently written fails to meet requirements for streamlined CEQA review.

Please take the following actions:

- |  |          |
|--|----------|
| 1. Buffers should be increased from the currently 1,500 feet to 2,500 feet   | I I100-1 |
| 2. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking   | I I100-2 |
| 3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes. | I I100-3 |
| 4. Revise the Climate Action Plan and corresponding policies in the General Plan to achieve measurable, enforceable reductions in greenhouse gas emissions   | I I100-4 |
| 5. The county should adopt the strongest possible measures to ensure that greenhouse gas emissions are curbed to protect air quality and to ensure a safe, sustainable future for all county residents   | I I100-5 |

Thank you for your time and attention to this most important issue.

Katharine Simmons

**Letter  
I100**

**Katharine S Simmons**  
February 27, 2020

- I100-1      The comment states that, as written, the 2040 General Plan does not meet requirements for streamlining and tiering subsequent California Environmental Quality Act (CEQA) review of project-level greenhouse gas emissions pursuant to State CEQA Guidelines Section 15183.5. This is accurate and reflected in the draft EIR. There is no requirement that the 2040 General Plan meet CEQA requirements for streamlined review. Page 4.8-46 of the draft EIR recommends Mitigation Measure GHG-3, which would remove the CEQA streamlining provision proposed in Implementation Program COS-EE from the 2040 General Plan and specify that the potential greenhouse gas (GHG) emissions impacts of future, discretionary projects be reviewed in accordance with the most recent adopted version of the ISAG at the time of project-level environmental review.



Mitigation Measure GHG-3 could result in additional GHG emission reductions if improved technologies, design features, or the like that are infeasible or unavailable today become available and are included in future development or required as part of future project-level reviews. To the extent this were to occur, this mitigation measure would improve progress toward meeting the 2030 and post-2030 GHG reduction targets. However, it would be speculative to determine at this time whether and how Mitigation Measure GHG-3 would affect future GHG emissions in the county. Because climate change impacts would remain significant and unavoidable following mitigation, the County has determined that CEQA streamlining pursuant to State CEQA Guidelines, Section 15183.5 for GHG emissions was not an appropriate 2040 General Plan program.

- I100-2 Refer to Master Response MR-4, Section MR-4.H, “Buffers (Setbacks),” regarding the findings and conclusions related to buffer (setback) distance.
- I100-3 Refer to Master Response MR-4, Section MR-4.G, “Pipeline Requirements,” regarding the findings and conclusions related to the conveyance of oil and produced water. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I100-4 Refer to Master Response MR-4, Section MR-4.F, “Flaring,” regarding the findings and conclusions related to flaring in oil and gas operations. The remainder of the comment addresses implementation of the 2040 General Plan and is not related to the adequacy of the draft EIR. However, this comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.
- I100-5 The comment states that the 2040 General Plan should be revised to achieve measurable, enforceable reductions in GHG emissions. The 2040 General Plan includes measurable targets for GHG emission reductions for 2030, 2040, and 2050 that are aligned with the State’s legislative GHG reduction targets and other reduction goals (see page 4.8-6 of the draft EIR). Refer to Master Response MR-1 for additional detail. This comment expresses disapproval of the 2040 General Plan and is not related to the adequacy of the draft EIR. This comment is acknowledged for the record and will be forwarded to the decision-making bodies for their consideration prior to making a decision on adopting a final 2040 General Plan.

Also, the comment states that the County should adopt “the strongest possible measures to ensure that greenhouse gas emissions are curbed.” Refer to Master Response MR-1 for additional detail regarding the development of the GHG inventory, policies, and programs of the 2040 General Plan.